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ASTM STANDARD E1527-97
PHASE I ENVIRONMENTAL SITE ASSESSMENT
Performed For
J.L. CLARK
On The Property Commonly Known As
2300 Wisconsin Avenue
Downers Grove, Illinois
March 3, 1998

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MOSTARDI PLATT PROJECT 80622

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1.0 EXECUTIVE SUMMARY

J.L. Clark (JLC) retained MOSTARDI-PLATT ASSOCIATES, INC. (Mostardi Platt) to perform a Phase I Environmental Site Assessment of the real property commonly known as 2300 Wisconsin Avenue in Downers Grove, Illinois (the Property). This Phase I Environmental Site Assessment was conducted to meet the required elements of the American Society of Testing and Materials (ASTM) Standard E1527-97 entitled, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* and the minimum requirements of Section 22 of the Illinois Environmental Protection Act, otherwise known as 415 ILCS 5/22.2. A glossary containing terms and definitions in the ASTM Standard E1527-97 is included in Appendix A.

This Phase I Environmental Site Assessment consists of the following:

- A visual inspection of the Property and accessible improvements
- An examination of title records
- A review of historical aerial photographs
- A visual inspection of adjoining and local properties as seen from the Property or from accessible public points of view
- Reviews of various geologic, soil, topographic, and wetlands maps
- A limited survey of building materials suspected of containing asbestos
- Interviews with government agency representatives and persons familiar with the Property
- A discussion of possible wetlands on the Property.

E1527-97 and 415 ILCS may enable a user to satisfy one of the requirements to qualify for the Innocent Landowner Defense of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); by demonstrating that the user performed "all appropriate inquiry into the previous ownership and uses of the Property consistent with good commercial or customary practice," as defined in United States Code 42, Section 9601 (35) (B).

2.2 Standard of Care

Mostardi Platt conducted this Phase I Environmental Site Assessment in accordance with generally accepted practices and in a manner consistent with that level of care ordinarily exercised by members of our profession currently performing Phase I Environmental Site Assessments in the same locality and under similar conditions of time and accessibility of improvements and information. No other representations, expressed or implied, and no warranty or guarantee is included or intended to be part of this Phase I Environmental Site Assessment or report.

Mostardi Platt formulated this report using a defined scope of services considered appropriate on the date the service was authorized in writing, unless the scope of services or the methods used were later modified, in writing, and accepted by Mostardi Platt prior to performance.

2.3 Limitation of Use

This report is confidential and has been prepared for JLC. JLC indicated that a copy of this report may be relied upon by Darwin Realty & Development Corporation. No additional party beyond those referenced above may use the information contained in this report without obtaining the written permission of both Mostardi Platt and JLC. Mostardi Platt's duties and obligations extend to JLC and to no other party. Mostardi Platt's duties and obligations to JLC are not transferable to any person, corporation, or organization without the express written consent of both JLC and Mostardi Platt.

This report must be read and interpreted as a whole. Individual sections and appendices of this report are dependent on the balance of this report, and on the terms, conditions, and stipulations contained in the proposal, the report, and any written amendments accepted by Mostardi Platt.

2.4 Limiting Conditions and Exceptions of Assessment

This report is based in part on information obtained from commercial data sources and interviews with government agency representatives, employees or former employees of operations located at the Property, and current owners or occupants of the Property.

Mostardi Platt assumes this information to be accurate. Mostardi Platt's findings are based on our observations, inquiries, and historical research. We identify Recognized Environmental Conditions using reasonably ascertainable information. Mostardi Platt does not represent that this Phase I Environmental Site Assessment reflects findings of all the information available for the Property, nor is it representative of future Property conditions. Activities or episodes that transpire subsequent to this Phase I Environmental Site Assessment are not considered in this investigation.

Mostardi Platt examined the building on the Property for exposed, reasonably accessible, suspect ACBM. However, we did not perform a comprehensive ACBM inspection as part of this Phase I Environmental Site Assessment. Mostardi Platt observed the surface of the Property for indications of Recognized Environmental Conditions. However, a subsurface examination designed to collect soil and groundwater samples and to analyze for the presence of hazardous substances, petroleum, or chemicals or their constituents, is beyond the scope of this Phase I Environmental Site Assessment. Due to the presence of equipment and supplies in the warehouse area of the building, Mostardi Platt was unable to fully inspect the interior of the building. In addition, based on the availability of reasonably ascertainable historical information, Mostardi Platt was unable to research the history of the Property prior to 1951.

2.5 Authorization

Mostardi Platt initiated this Phase I Environmental Site Assessment pursuant to written authorization received from Mr. John Benton of JLC on February 2, 1998. Mostardi Platt performed this Phase I Environmental Site Assessment subject to the terms and conditions of Mostardi Platt Proposal 013093, dated January 21, 1998. Mostardi Platt Proposal 013093 contains the scope of services, a cost estimate, and general terms and conditions governing this Phase I Environmental Site Assessment. A copy of Mostardi Platt's Proposal for this Phase I Environmental Site Assessment is included in Appendix B.

3.0 SITE DESCRIPTION

3.1 Location and Legal Description

The Property generally lies north of Wisconsin Avenue, east of Belmont Road, south of Curtiss Street, and west of James Avenue at 2300 Wisconsin Avenue in Downers Grove, DuPage County, Illinois. Maps showing the location of the Property are included in Appendix C.

The legal description of the Property was obtained from a Plat of Survey prepared by Carl R. Harrington, Registered Illinois Land Surveyor on May 30, 1974. The legal description and the Plat of Survey are included as Appendix D of this report.

3.2 Site and Vicinity Characteristics

The Plat of Survey shows the Property has a street frontage of approximately 500 feet along Wisconsin Avenue and contains a total area of approximately five acres. The Property is located in a mixed-use commercial and industrial area of Downers Grove, Illinois. Mostardi Platt observed local area adjoining properties for current uses or conditions that may create Recognized Environmental Conditions on the Property. Mostardi Platt saw no surficial evidence to indicate that adjoining properties may have created Recognized Environmental Conditions on the Property.

3.3 Surface Description and Improvements

The Property has been improved with a partial two-story, 54,000 square foot building, asphalt-paved parking and driveway areas, and decorative landscaping. The building is of masonry brick and steel frame construction with a poured concrete foundation and floor and a steel decked roof. The building is divided into office (approximately 5,000 square feet) and warehouse space (48,000 square feet). The warehouse was formerly divided into two main production areas, a shipping and receiving area, a maintenance shop, general storage areas, a chemical storage area and a quality control lab. The chemical storage area is a concrete-beamed, approximately 500 square foot room which is known as the paint locker. These areas are discussed in further detail in Section 5.3 of this report.

In addition, Ameritech leases approximately 1,000 square feet of land on the northern portion of the Property from JLC for a cellular communications tower, associated equipment building and gravel access road. The building covers approximately 80% of the surface of the Property, with asphalt parking and driveway areas located on the east and west sides of the Property. Approximately 3,000 square feet of the northeastern portion of the Property is unimproved. Decorative landscaping includes grassy, lawn type areas, bushes and shrubbery located on the southern side of the building.

Access to the Property is via Wisconsin Avenue which is located south of the Property and runs in an east-west direction. The Village of Downers Grove storm and sanitary sewers run beneath Wisconsin Avenue and service the building from the south. The Village of Downers Grove provides potable water to the Property, which is obtained from Lake Michigan. Mostardi Platt saw no ground water wells or evidence of a septic field for sanitary wastewater disposal on the Property during the inspection.

Natural gas is supplied to the Property by Nicor Gas. The office portion of the building is cooled by a roof mounted central air conditioning unit. Electricity is supplied to the Property by ComEd.

Mostardi Platt photographed selected sites, operations, and improvements located at or near the Property to support this written report. The photographs are included in Appendix E of this report.

3.4 Current and Historical Property Use

There are currently no manufacturing process conducted on the Property. JLC is currently in the process of selling and redistributing all equipment, furniture, supplies, and chemicals inside the building. According to Mr. Benton, operations formerly consisted of the manufacture and coating of small aluminum, collapsible tubes (i.e. ointment, toothpaste, and cream tubes) for wholesale to primarily pharmaceutical companies. Mr. Benton stated that these operations were conducted between 1961 and February 1998. The building was originally occupied by Atlas Tube Company (1961-1966), when J.L. Clark bought Property in 1967. According to records on file at the Downers Grove Building Department, the building was constructed on previously unimproved land. In addition, Mostardi Platt reviewed historical aerial photographs and observed that the Property was unimproved prior to construction of the building in approximately 1961.

3.5 Current and Historical Use of Adjoining Properties

The adjoining properties consist of industrial and commercial facilities. Mostardi Platt reviewed historical aerial photographs and government records and observed that adjoining properties were unimproved land prior to the general development of the area in the late 1960's. Mostardi Platt observed no Recognized Environmental Conditions regarding the current and historical use of adjoining properties. The following is a listing of the current adjoining properties including the facility name, address, operation, and direction from the Property.

ADJOINING PROPERTIES			
Facility Name	Address	Operation	Direction from the Property
Arrow Gear Company	2301 Curtiss Street Downers Grove, Illinois	Gear Manufacturing and Sales	North

ADJOINING PROPERTIES			
Facility Name	Address	Operation	Direction from the Property
Wisconsin Avenue Offices	2218 Wisconsin Avenue Downers Grove, Illinois	Commercial Office	East
TriCon	2325 Wisconsin Avenue Downers Grove, Illinois	Not Posted	South
Magnatec	2333 Wisconsin Avenue Downers Grove, Illinois	Not Posted	Southwest
Suburban Self Storage	2400 Wisconsin Avenue Downers Grove, Illinois	Storage	Southwest
Bridge Street High School/Vocational Services	2302-2318 Wisconsin Avenue Downers Grove, Illinois	Vocational Education	West

4.0 RECORDS REVIEW

Mostardi Platt obtained and reviewed published, reasonably ascertainable information concerning the physical setting and environmental status of the Property. Mostardi Platt obtained that information from the following sources:

- Records on file at the Chicago Title and Trust Company Offices and the Village of Downers Grove Building and Fire Departments
- Commercial enterprises that compile federal, state, and local environmental regulatory agency lists
- A topographic map prepared by the United States Geological Survey (USGS)
- Aerial photographs from Chicago Aerial Photo Services (CAPS) and the Northeastern Illinois Planning Commission (NIPC)
- Maps and publications prepared by the Illinois State Geological Survey (ISGS)
- NIPC list of solid waste disposal sites

Summaries of our reviews are contained in the following sections.

4.1 Topography and Regional Subsurface Geology

The Property is gently sloping toward the north with a maximum elevation difference estimated to be less than 10 feet across the surface of the Property. Mostardi Platt saw no grade changes to the Property as judged relative to the topography of adjoining properties and Mostardi Platt's examination of a topographic map. The topographic map prepared by the USGS (Wheaton, Illinois Quadrangle, 1962, photorevised 1972 and photoinspected 1980) indicates that the Property is approximately 700 feet above mean sea level. Based on our review of this topographic map, the regional surface water flow appears to be in a northerly direction toward an unnamed creek, which is located approximately 0.15 miles to the north of the Property. A copy of the USGS topographic map is included in Appendix F.

Mostardi Platt reviewed the ISGS publication and maps entitled *Stack-Unit Mapping of Geologic Materials in Illinois to a Depth of Fifteen Meters* and *Potential for Contamination of Shallow Aquifers in Illinois*. The *Stack-Unit Mapping of Geologic Materials in Illinois to a Depth of Fifteen Meters* publication shows the distribution of geologic material vertically in order of occurrence to a specified depth and horizontally over a specified area. The *Potential for Contamination of Shallow Aquifers in Illinois* publication combines hydrogeologic properties and vertical position of geologic materials to rate the potential for contamination of shallow aquifers¹. The rating ranges from A to G with A representing the highest potential and E, F, and G representing the lowest potentials for shallow aquifer impacts.

According to the ISGS publication, *Stack-Unit Mapping of Geologic Materials in Illinois to a Depth of Fifteen Meters*, soil in the area of the Property consists of clayey and silty till² soil of the Wadsworth Member of the Wedron Formation. Soil in the area of the Property is generally described as uniform, relatively impermeable till material of more than 50 feet thick.

In addition, the characteristics of native soil in the area of the Property would be expected to exhibit hydraulic conductivities³ between 1×10^{-9} and 1×10^{-7} centimeters

¹ "Aquifer" (as used in this report) means a water-bearing subsurface zone that is porous and permeable enough to produce a volume of water sufficient to sustain industrial, agricultural, or residential uses.

² "Till" means those unconsolidated materials deposited directly from a glacier without reworking by water (e.g., rivers or streams).

³ "Hydraulic conductivity" is a measure of the ability of soil or rock to conduct the flow of water. Hydraulic conductivity is usually stated in centimeters per second (cm/s), which is, in essence, velocity. For example, low hydraulic conductivity values would be 1×10^{-9} to 1×10^{-6} cm/s (clay), while high hydraulic conductivity would be 1×10^{-4} cm/s, or greater, (sand or gravel).

per second. Hydraulic conductivities in those ranges suggest that compound migration would be impeded by native clayey soil beneath the surface of the Property.

According to the ISGS publication, *Potential for Contamination of Shallow Aquifers in Illinois*, the potential for contamination of shallow aquifers in the area of the Property is rated E. This rating means the potential for groundwater contamination from surface spillage of chemical or petroleum or other potentially hazardous compounds is low because there is either uniform, relatively impermeable silty or clayey till or other fine-grained materials more than 50 feet thick, and no sand and gravel identified.

4.2 Federal, State, and Local Databases and Information Review

Mostardi Platt has access to various federal, state, and commercial information services that provide information on compliance with environmental law and investigations of reported violations of environmental law. Mostardi Platt obtained certain state and federal environmental database information from Environmental Risk Information & Imaging Services (ERIIS). ERIIS is a commercial provider of state and federal environmental database information. Mostardi Platt's review of the ERIIS Environmental Data Report disclosed the information summarized in the following subsections. A copy of the ERIIS Environmental Data Report is included in Appendix G.

Mostardi Platt reviewed ERIIS's summary of the following government databases and found no reported facilities within the below-listed radii.

- National Priority List - 1.0 miles
- Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) - 0.50 miles
- RCRA Treatment, Storage, and Disposal Facilities - 0.50 miles
- RCRA Corrective Action Facilities - 1.0 miles
- Emergency Response Notification System - Property and Adjoining Properties
- State Category Listing (SCL) - 1.0 miles
- RCRA TSD's Subject to Corrective Action (RCRA CORACTS) - 1.0 miles
- Illinois Land-Based Disposal Sites - 0.50 miles
- Area Solid Waste Disposal Sites (SWDS) - 1.0 miles
- Illinois Category List - 1.0 miles

4.2.1 Resource Conservation and Recovery Act (RCRA)

The Resource Conservation and Recovery Act (RCRA) program identifies and tracks regulated hazardous waste from the point of generation to the point of disposal. The USEPA maintains a list of facilities that generate, store, transport, treat, or dispose

regulated hazardous waste. The simple listing of a facility in the RCRA database does not automatically indicate that a Recognized Environmental Condition exists. Mostardi Platt reviewed ERIIS's summary of the July 1, 1997 USEPA RCRA Small- and Large-Quantity Hazardous Waste Generators lists in an effort to identify such facilities located within approximately one-quarter mile of the Property. ERIIS also researches the RCRA Administrative Action Tracking System (RAATS) database which lists RCRA fines and violations on file against a facility. ERIIS listed the following reported USEPA RCRA facilities of any of these types located within the above-referenced distances from the Property.

USEPA RCRA SMALL-QUANTITY GENERATORS		
RAATS	Name	Address
No	J.L. Clark Manufacturing Company/Atlas Tube	The Property
No	Tricon Industries, Inc.	2325 Wisconsin Avenue Downers Grove, Illinois
No	Principal Manufacturing	5400 Janes Avenue Downers Grove, Illinois
No	Arrow Gear Company	2301 Curtiss Street Downers Grove, Illinois
No	Econo Temp	5280 Belmont Road Downers Grove, Illinois
No	Heuft, Inc.	2512 Wisconsin Avenue Downers Grove, Illinois
No	CVP Systems, Inc.	2518 Wisconsin Avenue Downers Grove, Illinois
No	Precision Brand Products, Inc.	2250 Curtiss Street Downers Grove, Illinois
Yes - All Violations Resolved in 1992	Norwood Marketing System	2538 Wisconsin Avenue Downers Grove, Illinois
No	Serv All Company	5101 Chase Avenue Downers Grove, Illinois

USEPA RCRA LARGE-QUANTITY GENERATORS		
RAATS	Name	Address
No	Bison Gear and Engineering Company	2424 Wisconsin Avenue Downers Grove, Illinois
No	Magetrol International, Inc.	5300 Belmont Road Downers Grove, Illinois
No	Rexnord Corporation Bearing Operation	2400 Curtiss Street Downers Grove, Illinois
No	Ames Supply Company	2537 Curtiss Street Downers Grove, Illinois
No	Flexible Steel Lacing Company	2525 Wisconsin Avenue Downers Grove, Illinois

A detailed description of the wastes generated on the Property is included in Section 5.2 of this report.

The presence of a USEPA RCRA small or large quantity hazardous waste generator in the Property area does not indicate, in and of itself, the existence of a Recognized Environmental Condition at the Property. This listing provides information regarding only the name and type of hazardous waste generators in the general area of the Property. This listing can be used to determine the number of commercial or industrial hazardous waste generators in the general area of the Property.

4.2.2 Registered Underground Storage Tanks (USTs)

Owners and operators are required to register certain types of USTs with the Office of the Illinois State Fire Marshal (OSFM). The OSFM maintains a current list of registered USTs for the state of Illinois. Mostardi Platt reviewed ERIIS's summary of the May 5, 1997 OSFM list of registered USTs in an effort to identify registered USTs on the Property or adjoining properties. ERIIS listed the following registered UST located on adjoining Properties.

REGISTERED UNDERGROUND STORAGE TANKS				
Facility ID Number	Name	Address	No. of Tanks	Distance and Direction
2-001201	Arrow Gear Company	2301 Wisconsin Avenue Downers Grove, Illinois	0 (closed)	Northern Adjoining Property
2-003084	Magnatek, Inc.	2333 Wisconsin Avenue Downers Grove, Illinois	4 (active)	Southwestern Adjoining Property

The presence of registered petroleum USTs on local area or adjoining properties does not indicate, in and of itself, that a Recognized Environmental Condition exists on the Property.

4.2.3 Leaking Underground Storage Tank (LUST) Incident Reports

The Illinois Environmental Protection Agency (IEPA) publishes a list of reported leaking underground storage tanks (LUSTs). Users of the list are required to provide the following notice: "This list of LUST sites is a nonverified, unconfirmed list and should not be used or considered as a final IEPA determination regarding whether releases have occurred at the sites on the list. Sites have been included in this list based on reports of releases at the site received by the IEPA. The IEPA, in providing this list, makes no representations regarding the accuracy of the information contained in the list. The IEPA is in the process of confirming the type and size of the release, if any, the proper owner or operator, and the location of each site." Mostardi Platt reviewed ERIIS's summary of the July 24, 1997 IEPA LUST incident list in an effort to identify reported LUST incidents at facilities within approximately one-half mile of the Property. ERIIS listed the following LUST incidents reported at facilities located within approximately one-half mile of the Property.

REPORTED LEAKING UNDERGROUND STORAGE TANKS				
Incident No.	Name	Address	Distance and Direction	Year Reported
913065	Suburban Moving & Storage	2400 Wisconsin Avenue Downers Grove, Illinois	Southwestern Adjoining Property	1991
930214	Arrow Gear Company	2301 Curtiss Street Downers Grove, Illinois	Northern Adjoining Property	1993

REPORTED LEAKING UNDERGROUND STORAGE TANKS				
Incident No.	Name	Address	Distance and Direction	Year Reported
880876	Molex, Inc.	5224 Katrine Avenue Downers Grove, Illinois	0.35 Miles Northwest	1988
900983	Amoco Oil Company No. 9776	2231 Maple Avenue Downers Grove, Illinois	0.45 Miles Southeast	1990
962032 & 921361	Slampak Enterprises/ Union 76	4947 Belmont Road Downers Grove, Illinois	0.49 Miles Northeast	1996

According to Mr. Kyle Blumhorst, Project Manager with the Illinois Environmental Protection Agency (IEPA), Suburban Moving & Storage received closure from the IEPA on March 1, 1996 for a release of diesel fuel. In addition, Arrow Gear Company received closure from the IEPA on August 9, 1996 for a "non-petroleum" release. Based on this information, these adjoining LUST incidents are not expected to pose a Recognized Environmental Condition to the Property.

No additional information was available to Mostardi Platt during the course of this Phase I Environmental Site Assessment to determine the potential environmental impact, if any, to the Property from the remainder of the above-referenced LUST incidents. Mostardi Platt believes that the environmental impact to the Property, if any, from these reported LUST incidents would be diminished based on their distances from the Property, the presence of structures, roads, and underground utilities that may redirect the flow of contaminants between these reported LUST incidents and the Property, and the published information describing the regional subsurface geology consisting of relatively impermeable, clayey soil.

4.2.4 Unmappable Sites

A limitation of some federal, state, and local government databases is that they often contain incomplete or incorrect address information. Without proper addresses, ERIIS cannot locate and map these sites. Unmappable sites located by Mostardi Platt during the inspection of local area properties are included in each applicable section. Mostardi Platt did not observe any of these unmappable sites on the adjoining or local area properties. Based on Mostardi Platt's review of ERIIS's list of unmappable sites, we believe none of these sites are within the applicable radii of the Property.

4.3 Historical Records, Photographs, and Maps Review

Mostardi Platt gathered information from county records, government agencies, and commercial enterprises regarding historical use of the Property and size and age of improvements at the Property. The following sections summarize Mostardi Platt's review of these historical records, photographs, and maps.

4.3.1 Village of Downers Grove Fire Department Records Review

Mostardi Platt reviewed files at the Village of Downers Grove Fire Department which consisted of two inspection reports dated in 1994 and 1996, respectively. According to Fire Inspector Jim Stupka with the Village of Downers Grove Fire Prevention Bureau, files dated prior to 1994 have been sent off site for microfilm reduction and are not available for review. Fire Inspector Stupka stated that to the best of his knowledge there have been no major violations pertaining to chemical storage or handling. In addition, Fire Inspector Stupka further stated that to the best of his knowledge, there have been no chemical explosions or releases on the Property.

4.3.2 Village of Downers Grove Building Department

Mostardi Platt reviewed the Village of Downers Grove Building Department records for the Property as part of this Phase I Environmental Site Assessment. Records on file consisted of a Plat of Survey dated 1960 and an application to construct an addition to the building in 1978. The Plat of Survey indicated that the Property consisted of an unimproved parcel.

4.3.3 Title Records Review

Mostardi Platt reviewed the Grantor/Grantee Index at the Chicago Title and Trust Company in Carol Stream, Illinois. Mostardi Platt reviewed these records in an effort to identify prior owners and to determine the prior uses of the Property. According to the Grantor/Grantee Index, J.L. Clark Manufacturing Company was the last grantee in the chain-of-title to the Property. J.L. Clark Manufacturing Company gained an interest in the Property by Quit Claim Deed in 1991. Mostardi Platt noted no recorded state or federal environmental liens on the Property. During the title records review, Mostardi Platt identified no Recognized Environmental Conditions regarding past Property ownership. A summary of the title information for the Property is included in Appendix H.

4.3.4 Sanborn Fire Insurance Map Review

Sanborn Fire Insurance (Sanborn) Maps were developed to assist insurance companies in setting fire insurance rates. These maps frequently show the existence and location

of aboveground storage tanks (ASTs) and USTs, structures, improvements, and operations on the Property at various times ERIIS is a commercial enterprise that specializes in providing historical mapping services to the environmental industry. Mostardi Platt attempted to obtain site-specific, historical Sanborn Maps from ERIIS Sanborn to review as part of this Phase I Environmental Site Assessment. According to the ERIIS Sanborn Report, no Sanborn Maps were found for the Property in the ERIIS collection. A copy of the ERIIS Map Site Search Report is included in Appendix I.

4.3.5 Aerial Photograph Review

Mostardi Platt reviewed individual, historical, stereo and non-stereo, aerial photographs of the Property, obtained from CAPS and NIPC. Mostardi Platt reviewed the 1951, 1956, 1963 1970, 1975, 1980, 1985, 1990, and 1995 aerial photographs in an effort to identify Recognized Environmental Conditions on the Property.

The 1951 and 1955 aerial photographs depict the Property and adjoining properties as agricultural cropland.

The 1963 and the 1970 aerial photographs show the Property as improved with an irregular shaped building with paved parking and driveway areas on the west and east sides of the building. The northern and northeastern portions of the Property are depicted as unimproved areas. The northern adjoining property is improved with a building and associated paved parking and driveway areas. The eastern and western adjoining properties are depicted as unimproved land. The southern adjoining property is improved with a square building, the southwestern adjoining property is improved with a rectangular shaped building and the southeastern adjoining property is depicted as a grassy, unimproved parcel.

The 1980 aerial photograph depicts the Property and the northern, eastern, southern, southwestern and southeastern properties in the same general configuration as shown on the 1975 aerial photograph. The western adjoining property is now improved with a rectangular shaped building and associated paved parking and driveway areas.

The 1985, 1990, and 1995 aerial photographs depict the Property and adjoining properties in the same general configuration as shown on the 1980 aerial photograph, with the exception that the buildings on the northern and southern adjoining properties have been expanded.

Mostardi Platt observed no evidence of fill activity, surface scarring, staining, or other Recognized Environmental Conditions on the Property during this aerial photograph review.

5.0 SITE RECONNAISSANCE

Mostardi Platt inspected the Property on February 11 and 16, 1998. Ms. Kimberly Peterson, Project Manager of Mostardi Platt, was accompanied by Mr. Benton, who answered questions concerning the current and past use of the Property, the facility operations, and recent improvements to the Property. Mostardi Platt looked for the following items that may have an environmental impact on the Property:

- Chemicals stored on the Property
- Suspect waste generation practices
- Unusual surface conditions
- USTs and ASTs
- Equipment suspected of containing Polychlorinated Biphenyls (PCBs)
- Building materials suspected of containing asbestos
- Wetlands
- Other substances, materials, or geologic environments that may have an environmental impact on the Property.

The following sections summarize our observations and interviews during the inspection.

5.1 Stored Chemicals

Mostardi Platt looked for chemicals and potentially hazardous substances stored on the Property during the inspection. Mostardi Platt found the following chemicals and potentially hazardous substances stored on the Property.

CHEMICALS AND POTENTIALLY HAZARDOUS SUBSTANCES		
Type of Chemical	General Location	Approximate Quantity
White Coating	Warehouse	350-Gallons
Mixed Waste Materials (Primarily Spent Coating Material)	Paint Locker	Eleven, 55-Gallon Drums
Yellow Coating	Paint Locker	1, 55-Gallon Drum
Gear Oil	Warehouse	Three, 55-Gallon Drums
Copper Tube Enamel	Warehouse	22, 5-Gallon Containers
Clear Vinyl	Warehouse	22, 5-Gallon Containers
Paint	Warehouse	11, 10-Gallon Containers

CHEMICALS AND POTENTIALLY HAZARDOUS SUBSTANCES		
Type of Chemical	General Location	Approximate Quantity
Clear Coat	Warehouse	Three, 55-Gallon Drums
Inside Spray Coat	Warehouse	Six, 55-Gallon Drums
Waste Ink	Warehouse	Two, 55-Gallon Drums
Acetone	Warehouse	Three, 55-Gallon Drums
Waste Coatings	Warehouse	Six, 55-Gallon Drums
Oil	Former Air Compressor Room	Seven, 55-Gallon Drums

In addition, Mostardi Platt observed commonly available janitorial and cleaning supplies stored in the building during the Property inspection. Mostardi Platt saw no improper chemical storage practices or uncontrolled releases of chemicals on the Property during the inspection. According to Mr. Benton these chemicals will be removed from the building no later than March 1998, as operations have ceased completely.

Mostardi Platt asked Mr. Benton if MSDS are maintained on file for chemicals stored on the Property. Mr. Benton indicated that MSDS are on file for chemicals formerly used and stored on the Property. The MSDS indicate that the white coatings were the primary chemical used during normal operations. The white coatings were mainly toluene or methyl ethyl ketone based. In addition, JLC utilized a 1,1,1 trichloroethane parts washer from approximately 1961 through the 1970's when JLC switched to a petroleum naphtha based parts washing solution. In 1996, JLC began using a citrus based cleaner for its parts washing activities. Mostardi Platt also observed various MSDS which indicated that aerosol spray cleaners which contained 1,1,1 trichloroethane were utilized on the Property. Based on conversations with JLC personnel, these 1,1,1 trichloroethane based aerosol products were used infrequently and not stored in large quantities. Mr. Jim Klotz, Environmental Engineer with JLC stated that methyl ethyl ketone and acetone were the primary cleaning agents for product lines (during color changes, etc.) and for equipment cleaning. According to Mr. Benton, Mr. Linn Vehslage, Maintenance Supervisor and Mr. Klotz, chemicals have never been stored outside and there have been no major spills. Mostardi Platt reviewed the MSDS kept on file at the Property and the MSDS appeared to be complete and in order.

5.2 Waste Generation

JLC is listed as a small quantity generator of hazardous waste with an identification number of ILD 005130000. According to Mr. Benton, no wastes were generated at the Property at the time of the inspection. Former waste generated at the Property included spent coatings, spent ink, spent solvent, scrap aluminum, oil/water solution (from air compressors), oil filters, air filters, rags, and municipal trash. In addition, there were “one-time” removals of lead brick and asbestos.

Spent solvent generated from parts washing activities was drained from the parts washing unit into 55-gallon drums by JLC personnel, and hauled off-site for disposal by Safety Kleen. Spent solvent generated from product line cleaning activities and solvent-contaminated rags were collected in 55-gallon drums by JLC personnel and hauled off-site for disposal by WRR. Beaver Oil hauled off and recycled the oil-water solution generated by air compressor systems. Spent ink was collected in 55-gallon drums and hauled off-site for disposal by WRR. General municipal trash, air filters, and oil filters were collected in steel dumpsters, emptied, and hauled off-site for disposal by Waste Management, Inc. on a bi-weekly basis. Finally, aluminum was collected in roll-off containers and hauled off-site for recycling by Mazhel Metals on an as-needed basis. Mostardi Platt was provided with an internal record tracking memo titled “Manifested Waste Shipments - 1996”, which details the quantity of parts washing solvent, waste solvent, and oil-water solution generated and disposed of in 1996. This memo is included as Appendix J.

Environmental Waste Services, Incorporated removed approximately 10 cubic yards of lead-contaminated brick from JLC’s former lead smelting equipment on November 2, 1990 (Appendix K). According to Mr. Dean Dodson, Production Supervisor of JLC, JLC ran lead tube production lines from approximately 1961-1975. These lead contaminated-bricks were a result of when the lead smelter equipment was finally removed from the building in 1990.

JLC provided Mostardi Platt with several asbestos removal invoices from Acacia Environmental Services, Inc. According to these invoices, 16 linear feet of thermal systems insulation in 1992, “systems insulation”, two asbestos containing doors were removed in 1993, and an “asbestos containing machine” and insulation in 1994, were removed from the building by Acacia Environmental Services personnel.

JLC was named a De Minimis Potentially Responsible Party (PRP) in 1994 regarding a Superfund Site in Griffith, Indiana. JLC utilized American Chemical Services of Indiana to haul off spent chemical waste. The United States Environmental Protection Agency proposed a settlement option, known as an “Administrative Order on Content” in which JLC was required to pay \$3,079.79 (based on a weighted calculation) which

apparently absolved JLC of further liability in this Superfund issue. Correspondence regarding this issue is included as Appendix L.

5.3 Interior and Exterior Property Surface Conditions

Mostardi Platt saw one floor drain inside the warehouse portion of the building and floor drains in the restrooms of the office portion of the building during the inspection. Mostardi Platt observed surficial staining in the area of the warehouse floor drain which is located near the former lead tube production area. No further information regarding this staining was available from JLC personnel. Mostardi Platt did not see a sump in the building during the inspection.

In addition, Mostardi Platt observed surficial staining and pitted concrete in the former paint locker (former coating, paint, solvent, sealant, and petroleum storage), in the areas underneath the tube production lines, and in the area of the former lead tube production area. According to Mr. Dadson, the pitted concrete in the area of the former lead production is due to the use of heavy carts containing metals and other items. Finally, Mostardi Platt observed some pitting on the concrete floor, near the location of the former 1,1,1 Trichloroethene parts washer. Although Mostardi Platt did not observe large cracks or fissures in the floor, several small cracks and seams were observed throughout the plant, including in the paint locker and underneath and around the former aluminum and lead production line areas.

Mostardi Platt observed no evidence of soil discoloration, or stressed or defoliated vegetation on the exterior surface of the Property during the inspection.

Mostardi Platt saw no pits, ponds, lagoons, or stained pavement on the exterior surface of the Property during the inspection. Mostardi Platt identified no wells or septic systems on the Property. Wastewater is discharged into the sanitary sewer and surface water runoff from the roof and paved surfaces on the Property is directed into the storm sewer. Mostardi Platt saw no surficial evidence of open dumping or landfilling activities on the Property during the inspection.

5.4 Underground and Aboveground Storage Tanks

Mostardi Platt visually inspected the Property for surficial evidence of USTs and ASTs during the inspection. Mostardi Platt found no fillpipes, manways, vent lines, and or any other physical evidence of an UST or AST on the Property. In addition, based on Mostardi Platt's review of internal environmental documentation regarding the Property provided by JLC and interviews with JLC personnel, no records for the installation, removal, or abandonment of USTs on the Property were identified.

The building on the Property is currently heated by a natural gas-fired furnace, which would not require the storage of heating oil.

5.5 Polychlorinated Biphenyls (PCBs)

Mostardi Platt inspected the Property for the presence of electrical equipment, such as transformers and capacitors, that may be suspected of containing PCBs in their dielectric fluids. Mostardi Platt saw three pole-mounted electrical transformers on the west side of the Property during the inspection. These electrical transformers appeared to be in good condition with no visible leaks or irregularities. Areas under these electrical transformers exhibited no visible staining or abnormal appearance.

As a point of information, federal regulations issued pursuant to the Toxic Substance Control Act (TSCA) require that electrical transformers containing PCBs be marked as such. Mostardi Platt observed no labels indicating PCB content on the electrical transformers at the Property.

Federal regulations issued pursuant to TSCA also require electrical transformer owners to register with the owners or managing agent of the building any PCB-containing electrical transformers located within 30 meters of commercial buildings. Mostardi Platt has no information whether ComEd, the owner of the electrical transformers, complied with the 1985 TSCA regulation, if required. Mr. Benton stated that he has received no information regarding a PCB notification letter from ComEd. However, ComEd, as owner of these electrical transformers, is responsible for compliance with all applicable regulations governing electrical transformers.

Mostardi Platt also inspected the inside of the building to identify additional electrical equipment that may contain PCBs, such as fluorescent light ballasts, hydraulic lifts, and electrical capacitors. Fluorescent light ballasts, hydraulic lifts, and electrical capacitors have been known to contain PCBs in their insulating or lubricating oils. Specific regulatory requirements may apply to the disposal of PCB-containing electrical equipment and hydraulic fluids. Although no hydraulic lifts or electrical capacitors were observed, Mostardi Platt observed fluorescent lighting throughout the building. However, no leaks or stains were observed in association with the fluorescent light ballasts.

5.6 Asbestos Survey Procedures

Except for those relating to school buildings and certain OSHA requirements, there are no federal or state regulations regarding asbestos sampling techniques or mandating the management, abatement, or removal of asbestos. The Asbestos Hazard Emergency Response Act (AHERA) governs the testing procedures, management, abatement, and removal standards for ACBM in public and private grade school buildings

(kindergarten through 12th grade). No similar statute is applicable to industrial, commercial, or residential structures, provided that renovation or demolition activities are not scheduled for the building.

Mostardi Platt performed a limited, non-AHERA, survey of the interior of the building during the Property inspection. This survey was not intended to be a comprehensive search for all ACBM at the Property. The survey was designed to identify reasonably accessible material commonly suspected of containing asbestos within the proposed scope of services. In so doing, Mostardi Platt performed the following:

- Visually inspected reasonably accessible areas in the interior of the building to determine the existence and condition of suspect ACBM
- Grouped suspect ACBM into homogeneous areas based upon uniform color, texture, and other physical characteristics

The following table summarizes the material description, general location, estimated quantity, and condition of the suspect ACBM identified by Mostardi Platt at the Property during the inspection.

SUSPECT ASBESTOS-CONTAINING BUILDING MATERIALS			
Material Description	General Location	Estimated Quantity	Condition
2- by 4-foot Ceiling Tile	Warehouse Supervisor's Office	300 Square Feet	Good
1- by 1-Foot Ceiling Tile	Main Office Area	3,000 Square Feet	Good
9 by 9-inch Tan Floor Tile	Main Office Area and Locker Areas	2,000 Square Feet	Good
12- by 12-inch Brown Floor Tile	Cafeteria	1,000 Square Feet	Good

Mostardi Platt did not sample these materials because we did not wish to disturb previously undamaged materials in occupied areas. Furthermore, extensive asbestos sampling is beyond the scope of this Phase I Environmental Site Assessment. Finally, these findings are not adequate for the preparation of cost estimates for the management or abatement of the suspect ACBM identified at the Property.

JLC provided Mostardi Platt a copy of an asbestos survey of the building which was prepared by Aerosol Monitoring & Analysis, Inc., titled *Final Report for the Asbestos Survey at J.L. Clark* dated July 12, 1988. Results from this report indicated that machine insulation, fitting insulation, pipe insulation, line insulation, duct insulation, blower

insulation, bagged insulation, debris insulation, gasket insulation, oven insulation, and floor tile in the main office and locker areas were found to contain asbestos fibers. In addition, JLC provided Mostardi Platt with several asbestos removal invoices from Acacia Environmental Services, Inc. According to these invoices, 16 linear feet of thermal systems insulation in 1992, "systems insulation", two asbestos containing doors were removed in 1993, and an "asbestos containing machine" and insulation in 1994, were removed from the building by Acacia Environmental Services personnel.

As a point of information, renovation or demolition of areas containing ACBM may be regulated in accordance with the National Emissions Standards for Hazardous Air Pollutants (NESHAP) and by OSHA regulations. ACBM should not be altered without consulting the NESHAP and OSHA regulations. Furthermore, if ACBM is to be removed, a qualified asbestos abatement contractor should be contacted.

5.7 Wetlands

Mostardi Platt observed no ponded water, flowing water, saturated soils, or hydrophytic vegetation at the Property during the inspection. According to the National Wetlands Inventory Map for the Property (Wheaton, Illinois Quadrangle, 1984), the Property contains no identified wetlands. According to the Soil Survey of DuPage and Parts of Cook Counties, the Property contains urban land-markam-ashkum series soil, which is not considered a hydric soil (soil that developed under wet conditions). In addition, extensive identification and delineation of wetlands is beyond the scope of services for this Phase I Environmental Site Assessment.

6.0 FINDINGS AND CONCLUSIONS

Mostardi Platt has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Standard Practice E1527-97 and Section 22 of the Illinois Environmental Protection Act, otherwise known as 415 ILCS 5/22.2, of 2300 Wisconsin Avenue in Downers Grove, Illinois (the Property). Any exceptions to, or deletions from, the Standard Practice are described in Section 2.4 of this report. This Phase I Environmental Site Assessment has revealed no evidence of a Recognized Environmental Condition in connection with the Property except for the following:

- The presence of surficially stained and pitted areas on the concrete floor in the areas of the paint locker and former production lines where chemicals such as methyl ethyl ketone, toluene based products, mineral spirits, and acetone were used and stored in varying amounts for the past 36 years. In addition, Mostardi Platt observed the presence of small cracks, fissures, and seams in the area of the paint locker and former production lines. Mostardi Platt has no further information regarding the potential, if any, for environmental impact to the Property from these surficially stained, pitted, cracked and seamed areas on the concrete floor of concrete where solvents and solvent based materials were used and stored.

Mostardi Platt lists this item as Recognized Environmental Condition in order to identify areas that may warrant further discussion, explanation, or investigation to fully assess its impact on persons acquiring an interest in the Property. The fact that this issue is identified in this section as Recognized Environmental Condition does not, in and of itself, indicate that an environmental problem exists on the Property. Other items identified in the body of this report, which are not listed here, also may be of interest in light of a given transaction. Therefore, this report should be read as a whole.

Mostardi Platt will provide specific recommendations to JLC as requested and after appropriate discussion of issues raised and their potential impact on the transaction contemplated.

7.0 AFFIRMATION

The undersigned hereby affirms that:

We are the environmental professionals who prepared the audit and the facts stated in the report are true and made under a penalty of perjury as defined in Section 32-2 of the Illinois Criminal Code of 1961.

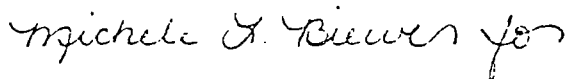
The reported analyses, opinions, and conclusions are personal, unbiased, professional, and limited only by the assumptions and qualifications stated herein. Compensation is not contingent upon an action or an event resulting from the analyses, opinions, or conclusions in, or the use of, this report.

This Phase I Environmental Site Assessment has been performed in accordance with applicable legal requirements and in accordance with accepted practices prevailing in the environmental industries. The persons who performed the investigation are properly licensed and certified in accordance with the requirements of federal, state, and local laws, rules, and regulations, as applicable.

We have no present or prospective interest in the Property or the parties involved.

Respectfully submitted,

MOSTARDI-PLATT ASSOCIATES, INC.

A handwritten signature in cursive script, appearing to read "Michele A. Brewer for".

Kimberly Peterson
Project Manager

KP/jmn

8.0 ENVIRONMENTAL PROFESSIONAL CREDENTIALS

Kimberly R. Peterson
Project Manager

Education

Bachelor of Arts—Political Science and German, Northeast Missouri State University, Kirksville, Missouri, 1993

Certified Environmental Auditor—National Directory of Environmental Professionals, July 1996

Environmental Experience

Ms. Peterson has conducted hundreds of Phase I Environmental Assessments encompassing both ASTM and compliance elements. She performed these assessments for a variety of transactions including stock purchase, asset purchase, refinancing, and foreclosure to provide operating budgets related to identified concerns. Over the last three years, Ms. Peterson has

- Conducted over 300 Phase I Environmental Assessments ranging from vacant parcels to heavy industrial facilities throughout the United States
- Completed a Phase I investigation of a steel wheel manufacturer in Königswinter, Germany, in January 1997
- Helped negotiate a remediation work plan with the Oregon Department of Environmental Quality concerning pesticide contamination in surficial soils that resulted in lower remediation costs for the client
- Helped negotiate environmental portion of a multi-million dollar deal of a commercial/industrial property

Professional Certifications and Qualifications

Certified Environmental Auditor
OSHA 40-Hour Hazardous Waste Site Worker
AHERA Asbestos Building Inspector
Fluent German

APPENDICES

- Appendix A: Glossary
- Appendix B: Phase I Environmental Site Assessment Proposal
- Appendix C: Property Location Maps
- Appendix D: Plat of Survey
- Appendix E: Property Photographs
- Appendix F: USGS Topographic Map
- Appendix G: ERIIS Environmental Data Report
- Appendix H: *Examination of Title Records*
- Appendix I: ERIIS Map Site Search Report
- Appendix J: Manifested Waste Shipments - 1996
- Appendix K: Lead Contaminated Brick Disposal Documentation
- Appendix L: De Minimis PRP Correspondence

Appendix A: Glossary

GLOSSARY

adjoining properties — any real property or properties the border of which is contiguous or partially contiguous with that of the property, or that would be contiguous or partially contiguous with that of the property but for a street, road, or other public thoroughfare separating them.

aerial photographs — photographs taken from an airplane or helicopter of areas encompassing the property. Aerial photographs are often available from government agencies or private collections unique to a local area.

appropriate inquiry — that inquiry constituting “all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice” as defined in CERCLA, 42 USC § 9601(35)(B), that will give a party to a commercial real estate transaction the innocent landowner defense to CERCLA liability (42 USC § 9601(A) and (B) and 9607(b)(3), assuming compliance with other elements of the defense.

asbestos-containing material (ACM) — any material or product that contains more than one percent asbestos.

building department records — those records of the local government in which the property is located indicating permission of the local government to construct, alter, or demolish improvements on the property. Often building department records are located in the building department of a municipality or county.

Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) — the list of sites compiled by EPA that have investigated or are currently investigating for potential hazardous substance contamination for possible inclusion on the National Priorities List.

construction debris — concrete, brick, asphalt, and other such building materials discarded in the construction of a building or other improvement to property.

demolition debris — concrete, brick, asphalt, and other such building materials discarded in the demolition of a building or other improvement to property.

drum — a container (typically, but not necessarily, holding 55 gal (208 L) of liquid) that may be used to store hazardous substances or petroleum products.

dry wells — underground areas where soil has been removed and replaced with pea gravel, coarse sand, or large rocks. Dry wells are used for drainage, to control storm

runoff, for the collection of spilled liquids (intentional and non-intentional) and wastewater disposal (often illegal).

due diligence — the process of inquiring into the environmental characteristics of a parcel of commercial real estate or other conditions, usually in connection with a commercial real estate transaction. The degree and kind of due diligence vary for different properties and differing purposes.

dwelling — structure or portion thereof used for residential habitation.

environmental professional — a person possessing sufficient training and experience necessary to conduct a site reconnaissance, interviews, and other activities in accordance with Practice E 1527, and from the information generated by such activities, having the ability to develop conclusions regarding recognized environmental conditions in connection with the property in question. An individual's status as an environmental professional may be limited to the type of assessment to be performed or to specific segments of the assessment for which the professional is responsible. The person may be an independent contractor or an employee of the user.

environmental site assessment (ESA) — the process by which a person or entity seeks to determine if a particular parcel of real property (including improvements) is subject to recognized environmental conditions. At the option of the user, an environmental site assessment may include more inquiry than that constituting appropriate inquiry or, if the user is not concerned about qualifying for the innocent landowner defense, less inquiry than that constituting appropriate inquiry.

ERNS list — EPA's Emergency Response Notification System list of reported CERCLA hazardous substance releases or spills in quantities greater than the reportable quantity, as maintained at the National Response Center.

fill dirt — dirt, soil, sand, or other earth, that is obtained off-site, that is used to fill holes or depressions, create mounds, or otherwise artificially change the grade or elevation of real property. It does not include material that is used in limited quantities for normal landscaping activities.

fire insurance maps — maps produced for private fire insurance map companies that indicate uses of properties at specified dates and that encompass the property. These maps are often available at local libraries, historical societies, private resellers, or from the map companies who produced them.

hazardous substance — any solid, liquid, or gas which is toxic, flammable, caustic, reactive/explosive, and/or radioactive.

hazardous waste — “a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may — (A) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (B) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed.”

The federal government describes hazardous waste based upon the characteristics of ignitability, corrosivity, reactivity, or toxicity, as described in RCRA.

hazardous waste/contaminated sites — sites on which a release has occurred, or is suspected to have occurred, of any hazardous substance, hazardous waste, or petroleum products, and on which release or suspected release has been reported to a government entity.

landfill — a place, location, tract of land, area, or premises used for the disposal of solid wastes as defined by state solid waste regulations. The term is synonymous with the term solid waste disposal site and is also known as a garbage dump, trash dump, or similar term.

local government agencies — those agencies of municipal or county government having jurisdiction over the property. Municipal and county government agencies include but are not limited to cities, parishes, townships, and similar entities.

local street directories — directories published by private (or sometimes government) sources that show ownership, occupancy, use of sites and/or by reference to street addresses. Often local street directories are available at libraries of local governments, colleges or universities, or historical societies.

LUST sites — state lists of leaking underground storage tank sites. Section 9003 (h) of Subtitle I of RCRA gives EPA and states, under cooperative agreements with EPA, authority to clean up releases from UST systems or require owners and operators to do so.

material safety data sheet (MSDS) — written or printed material concerning a hazardous substance which is prepared by chemical manufacturers, importers, and employers for hazardous chemicals pursuant to OSHA's Hazard Communication Standard.

National Priorities List (NPL) — list compiled by EPA pursuant to CERCLA 42 USC § 9605(a)(8)(B) of properties with the highest priority for cleanup pursuant to EPA's hazard ranking system.

occupants — those tenants, subtenants, or other persons or entities using the property or a portion of the property.

owner — generally the fee owner of record of the property.

petroleum products — those substances included within the meaning of the terms within the petroleum exclusion to CERCLA, 42 USC § 9601(14), as interpreted by the courts and EPA, that is: petroleum, including crude oil or any fraction thereof that is not otherwise specifically listed or designated as a hazardous substance under Subparagraphs (A) through (F) of 42 USC § 9601(14), natural gas, natural gas liquids, liquefied natural gas, and synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas). (The word fraction refers to certain distillates of crude oil, including gasoline, kerosene, diesel oil, jet fuels, and fuel oil, pursuant to Standard Definitions of Petroleum Statistics.

pits, ponds, or lagoons — man-made or natural depressions in a ground surface that are likely to hold liquids or sludge containing hazardous substances or petroleum products. The likelihood of such liquids or sludge being present is determined by evidence of factors associated with the pit, pond, or lagoon, including, but not limited to, discolored water, distressed vegetation, or the presence of an obvious wastewater discharge.

property — the real property that is the subject of the environmental site assessment described in this practice. Real property includes buildings and other fixtures and improvements located on the property and affixed to the land.

publicly available — information that is publicly available means that the source of the information allows access to the information by anyone upon request.

RCRA generators — those persons or entities which generate hazardous wastes, as defined and regulated by RCRA.

RCRA generators list — list kept by EPA of those persons or entities that generate hazardous wastes as defined and regulated by RCRA.

RCRA TSD facilities — those facilities on which treatment, storage, and/or disposal of hazardous wastes takes place, as defined and regulated by RCRA.

RCRA TSD facilities list — list kept by EPA of those facilities on which treatment, storage, and/or disposal of hazardous wastes takes place, as defined and regulated by RCRA.

reasonably ascertainable — for purposes of both this practice and Practice E 1527 information that is publicly available, obtainable from its source within reasonable time and cost constraints, and practically reviewable.

recognized environmental conditions — the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

report — the written record of a transaction screen process as required by Practice E 1527 or the written report prepared by the environmental professional and constituting part of a Phase I Environmental Site Assessment, as required by Practice E 1527.

site visit — the visit to the property during which observations are made constituting the site reconnaissance section the Phase I Environmental Site Assessment in Practice E 1527 and the *site visit* requirement of the transaction screen process in this practice.

solid waste disposal site — a place, location, tract of land, area, or premises used for the landfill disposal of solid wastes as defined by state solid waste regulations. The term is synonymous with the term landfill and is also known as a garbage dump, trash dump, or similar term.

solvent — a chemical compound that is capable of dissolving another substance and is itself a hazardous substance used in a number of manufacturing/industrial processes including, but not limited to, the manufacture of paints and coatings for industrial and household purposes, equipment clean-up, and surface degreasing in metal fabricating industries.

state-registered USTs — state lists of underground storage tanks required to be registered under Subtitle I, Section 9002 of RCRA.

sump — a pit, cistern, cesspool, or similar receptacle where liquids drain, collect, or are stored.

TSD Facility — treatment, storage, or disposal facility (see definition of RCRA TSD facilities).

underground storage tank (UST) — any tank, including underground piping connected to the tank, that is or has been used to contain hazardous substances or petroleum products and the volume of which is 10% or more beneath the surface of the ground.

user — the party seeking to use the transaction screen process of this practice or the Phase I Environmental Site Assessment of Practice E 1527 to perform an environmental assessment of the property, a potential tenant of property, an owner of property, a lender, or a property manager.

USGS 7.5 Minute Topographic Map — the map (if any) available from or produced by the United States Geological Survey, entitled "USGS 7.5 Minute Topographic Map," and showing the property.

wastewater — water that is or has been used in an industrial or manufacturing process, conveys or has conveyed sewage, or is directly related to manufacturing, processing, or raw materials storage areas at an industrial plant. Wastewater does not include water originating on or passing through or adjacent to a site, such as stormwater flows, that has not been used in industrial or manufacturing processes, has not been combined with sewage, or is not directly related to manufacturing, processing, or raw materials storage areas at an industrial plant.

zoning/land use records — those records of the local government in which the property is located indicating the uses permitted by the local government in particular zones within its jurisdiction. The records may consist of maps and/or written records. They are often located in the planning department of a municipality or county.

Appendix B: Phase I Environmental Site Assessment Proposal

January 21, 1998

Proposal 013093



Mr. John Benton
Vice President
J.L. Clark
2300 Wisconsin Avenue
Downers Grove, Illinois 60515

Dear Mr. Benton:

In response to your request, MOSTARDI-PLATT ASSOCIATES, INC. (Mostardi Platt) is pleased to submit this proposal for Phase I Environmental Site Assessment Services on one parcel of real property located at 2300 Wisconsin Avenue in Downers Grove, Illinois.

The purpose of the phased approach to performing an environmental assessment is to allow parties to a real estate transaction to cost effectively meet their "due diligence" or "...appropriate inquiry" obligations. Performing all of the sampling and analysis required to obtain complete assurance that there are no potential environmental liabilities associated with a parcel of real property may be extremely costly and is generally not required by the custom and usage in the real estate or lending industries. The premise of the Phase I Environmental Site Assessment is that reviewing reasonably available information involving the past or current use and activities on the property will indicate if there are potential Recognized Environmental Conditions. If a Recognized Environmental Condition is identified, then due diligence may require that further inquiry be made to adequately quantify the impact on the property.

Scope of Services

Mostardi Platt will conduct a Phase I Environmental Site Assessment in accordance with the American Society of Testing and Materials (ASTM) Standard E1527-97 entitled, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*, the minimum requirements of Section 22 of the Illinois Environmental Protection Act, otherwise known as 415 ILCS 5/22.2, and generally accepted industry standards regarding environmental site assessments. A Phase I Environmental Site Assessment shall consist of the following services:

- A 50-year examination of title records and business records, if available, to determine the former ownership and use of the property

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January 21, 1998
Proposal 013093
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- A review of a topographic map, historical aerial photographs, and Sanborn Fire Insurance Maps, if available, to investigate past property conditions
- A property inspection by a trained professional to investigate the current use of the property and identify the presence of hazardous substances, wastes, underground storage tanks, or other areas of environmental concern on the property
- A review of reasonably available government records for permits, citations, and reports connected to the property or corporation including waste disposal records
- A limited survey of building materials at the property suspected of containing asbestos
- An inspection of adjoining properties from reasonably available public viewpoints to identify the current use of these properties, if possible
- A review of specific government lists regarding environmental activities for the property and local area properties
- Preparation of a report which specifically lists any Recognized Environmental Condition identified during the course of the Phase I Environmental Site Assessment

Recognized Environmental Conditions identified during the Phase I Environmental Site Assessment will be reported to J.L. Clark as early as practical to allow as much time as possible to perform any additional work that may be required.

Project Fee

The fee for performing the Phase I Environmental Site Assessment as described above on the property is\$1,850.00.

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Any additional consultation or services, authorized in writing by J.L. Clark, beyond the scope of services described above will be billed to J.L. Clark according to the following fee schedule:

Officer.....	\$200/hr
Principal Engineering Consultant	\$150/hr
Director	\$135/hr
Senior Engineering Consultant/Professional Engineer.....	\$125/hr
Department Manager.....	\$120/hr
Senior Project Manager	\$90/hr
Project Manager	\$75/hr
Staff Engineer or Staff Scientist.....	\$60/hr
Field Supervisor	\$60/hr
Technician	\$45/hr
Clerical/Administrative Support.....	\$35/hr
Travel Expenses	Actual Costs

Additional Services

At J.L. Clark's request, Mostardi Platt can perform a Phase II Environmental Site Assessment if information discovered in the Phase I Environmental Site Assessment suggests that further investigation is needed. A Phase II Environmental Site Assessment may include, but is not limited to:

- Soil borings, sampling, and analysis of groundwater, soil, air and/or waste
- Precision leak testing of underground storage tanks and transfer lines
- Comprehensive sampling and analysis of building materials suspected of containing asbestos
- An investigation of topology and geology of the property to indicate the migration routes of potential contamination
- Further information review including forwarding Freedom of Information Act request letters

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- An inventory of chemicals used on the property to determine the applicability of the Illinois Responsible Property Transfer Act

Participation by J.L. Clark

Mostardi Platt will need the following information regarding the property to start the proposed Phase I Environmental Site Assessment:

- The copy of this letter signed by an authorized person
- A plat of survey showing the boundaries of the property
- The legal description of the property
- The permanent index number(s) (P.I.N. or tax number) of the property
- The name of the owner of record of the property
- The name and telephone number of the person who shall provide Mostardi Platt with access to the property
- Any other information in your possession regarding the environmental condition of the property or the existence of previous environmental reports, underground storage tanks, pipelines, or other underground structures

Payment Terms

Mostardi Platt will submit an invoice to J.L. Clark. All invoices are billed net. Payments not received within ten (10) days from the date billed are subject to a late payment charge of 1.5% per month until payment is received.

J.L. Clark
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Acceptance and Authorization

If the fee and attached General Terms and Conditions are acceptable to J.L. Clark, please indicate such acceptance by having an authorized person sign and title the enclosed copy of this letter in the space provided and return it to Mostardi Platt.

We appreciate the opportunity to submit a proposal to you for this project and look forward to working with you. If you have any questions regarding this proposal or require additional information, please call.

Respectfully submitted,

MOSTARDI-PLATT ASSOCIATES, INC.

Mathew D. Aigner

Mathew D. Aigner
Manager, Environmental Assessments

MDA/jmn

(Filename: J.L. Clark Phase I)

Accepted:
J.L. Clark

John Barton

(Signature)

JOHN BARTON

(Print Name)

Vice President - Business Development

(Title)

2/2/98

(Date)

GENERAL TERMS AND CONDITIONS

Our Agreement with you consists of these General Terms and Conditions and Mostardi Platt Proposal 013093.

1.0 PERFORMANCE OF WORK

1.1 Standard of Care. We will conduct all services relating to this Agreement in accordance with generally accepted practice in a manner consistent with that level of care ordinarily exercised by members of the industry currently performing services specified in this Agreement in the same locality and under similar conditions of time and accessibility of improvements and information. No other representations, expressed or implied, and no warranty or guarantee is included or intended to be part of this Agreement.

1.2 Accuracy of Measurements. We will reference our field observations and samplings to available reference points at the Property. We will not survey, set, or check the accuracy of those points unless we accept that duty in writing.

1.3 Failure to Follow Recommendations. If you do not follow our recommendations, you agree not to hold us liable for undesirable circumstances that may occur as a result of not following our recommendations.

1.4 Force Majeure. If you fail to provide us with specified facilities or information, or if you or your contractor are negligent, omit information, or cause delays, we reserve the right to renegotiate the cost and time schedule commitments of this Agreement. In addition, delays caused by incidents beyond our control—such as fires, floods, strikes, riots, explosions, adverse weather conditions, casualties, unavailability of labor or materials or services, process shutdown, acts of God, court orders, or acts, orders or regulations of any governmental agency—will prompt renegotiation of proposed costs and time schedules of this Agreement.

1.5 Accuracy of Information. We will use commercial information services from one commercial source that provide information about compliance with environmental laws and investigations of reported violations of environmental laws. These services do not insure the accuracy of the information they provide nor do

they carry insurance to cover errors or omissions that occur in the conversion of data they receive from government agencies. Therefore, our use of commercial services is subject to the same limitations. We assume that the information we receive from commercial information services is accurate unless other information obtained conflicts with it.

2.0 AGREEMENT TERMS

2.1 Notice. Any notice or communication required to be sent to either of the parties by the other will be deemed to have been sufficiently given when delivered in person to the other party or upon receipt of postage-prepaid, certified United States mail, or the equivalent, to your or our business address shown on the first page of our proposal in this Agreement.

2.2 Confidentiality. Unless you prohibit us from doing so, we may use your name in our promotional materials. When we use your name, we agree not to reference the exact services we performed or identify the properties involved.

2.3 Payment of Fees. You are responsible for paying any filing or application fees, penalties, or fines to any federal, state, or local governments relating to the services we propose to provide in this Agreement.

2.4 Assignment. You may not assign this Agreement without our prior written consent. Consequently, we may not assign this Agreement without your prior written consent.

2.5 Binding Effect. Both you and we understand and agree that this Agreement is binding on both parties, respective successors, and any assigned parties.

2.6 Severability. The provisions of this Agreement are severable. If one (or more) of the provisions in this Agreement proves invalid or unenforceable, it (or they) will not affect the validity and enforceability of the other provisions in this Agreement.

2.7 Governing Law. The provisions of this Agreement will be governed by the laws of the state of Illinois in the county of DuPage.

2.8 Survival. All obligations that occur before this Agreement is concluded and all the conditions of this Agreement that designate responsibility or liability between you and us will continue after services are completed and this Agreement is concluded.

2.9 Arbitration. Unless you and we agree differently, all claims, disputes, and other matters in question between us that arise out of or relate to this Agreement or breaking of this Agreement may be decided by the most current rules of the American Arbitration Association.

2.10 Other Compensation. You agree to compensate us for our reasonable expenses incurred if we are required to respond to legal processes related to our services for you that arise out of a lawsuit or a proceeding to which we are not a party.

2.11 Limitation of Liability. Our liability in connection with this Agreement, and any subsequent services we provide, is limited to \$20,000.00. We exclude all expressed or implied warranties in regard to the services or reports proposed including all warranties of merchantability and fitness for a particular purpose. In no event will we be liable for special, incidental, or consequential damages arising out of the services proposed in this Agreement or any subsequent services we provide.

2.12 Limitation of Use. We will prepare a confidential report for you. No third party may use the information contained in our report without written permission from both you and us. Our duties and obligations extend to you and to no other party. Our duties and obligations to you are not transferable to any person, corporation, or organization without the expressed written consent from both you and us.

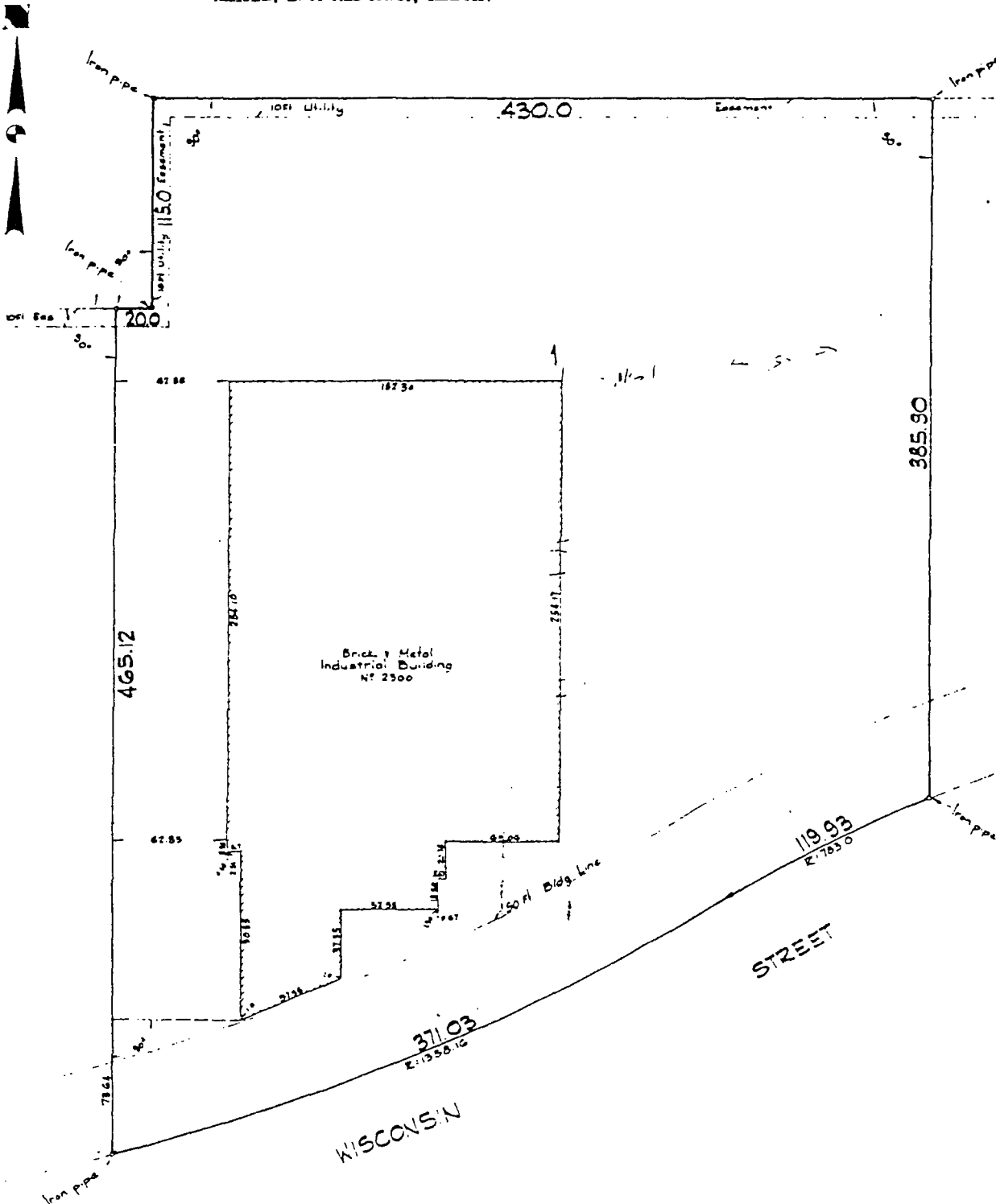
Appendix C: Property Location Maps

CARL R. HARRINGTON
 REGISTERED ILLINOIS LAND SURVEYOR
 59 E PARK BOULEVARD
 VILLA PARK, ILLINOIS 60181
 TELEPHONE: 834-5312

PLAT OF SURVEY

OF

LOT 1 IN "FRANK LOPATA RESUBDIVISION" OF LOTS 10, 11 AND 12 IN THE RESUBDIVISION OF LOTS 8 TO 13 INCLUSIVE, IN ELLSWORTH PARK UNIT #3 AND LOT 24 IN ELLSWORTH PARK UNIT #5, BEING A SUBDIVISION SITUATED IN PART OF THE SOUTHWEST QUARTER AND THE SOUTHEAST QUARTER OF SECTION 12, TOWNSHIP 38 NORTH, RANGE 10, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN DU PAGE COUNTY, ILLINOIS.



ORDERED BY: R. A. ANDERSON
 OWNER: J. L. CLARK MFG. CO.
 ORDER NO: 74-215
 SCALE: 1 inch = 40 feet

COMPARE ALL POINTS BEFORE BUILDING
 AND AT ONCE REPORT ANY DIFFERENCE.

STATE OF ILLINOIS)
 COUNTY OF DU PAGE) S.S.

I, CARL R. HARRINGTON, A REGISTERED ILLINOIS LAND SURVEYOR, DO HEREBY CERTIFY THAT I HAVE SURVEYED THE ABOVE DESCRIBED PROPERTY AND THAT THE PLAT HEREON DRAWN IS A CORRECT REPRESENTATION OF SAID SURVEY. DIMENSIONS ARE SHOWN IN FEET AND DECIMAL PARTS THEREOF AND ARE CORRECT AT 62 DEGREES FAHRENHEIT.

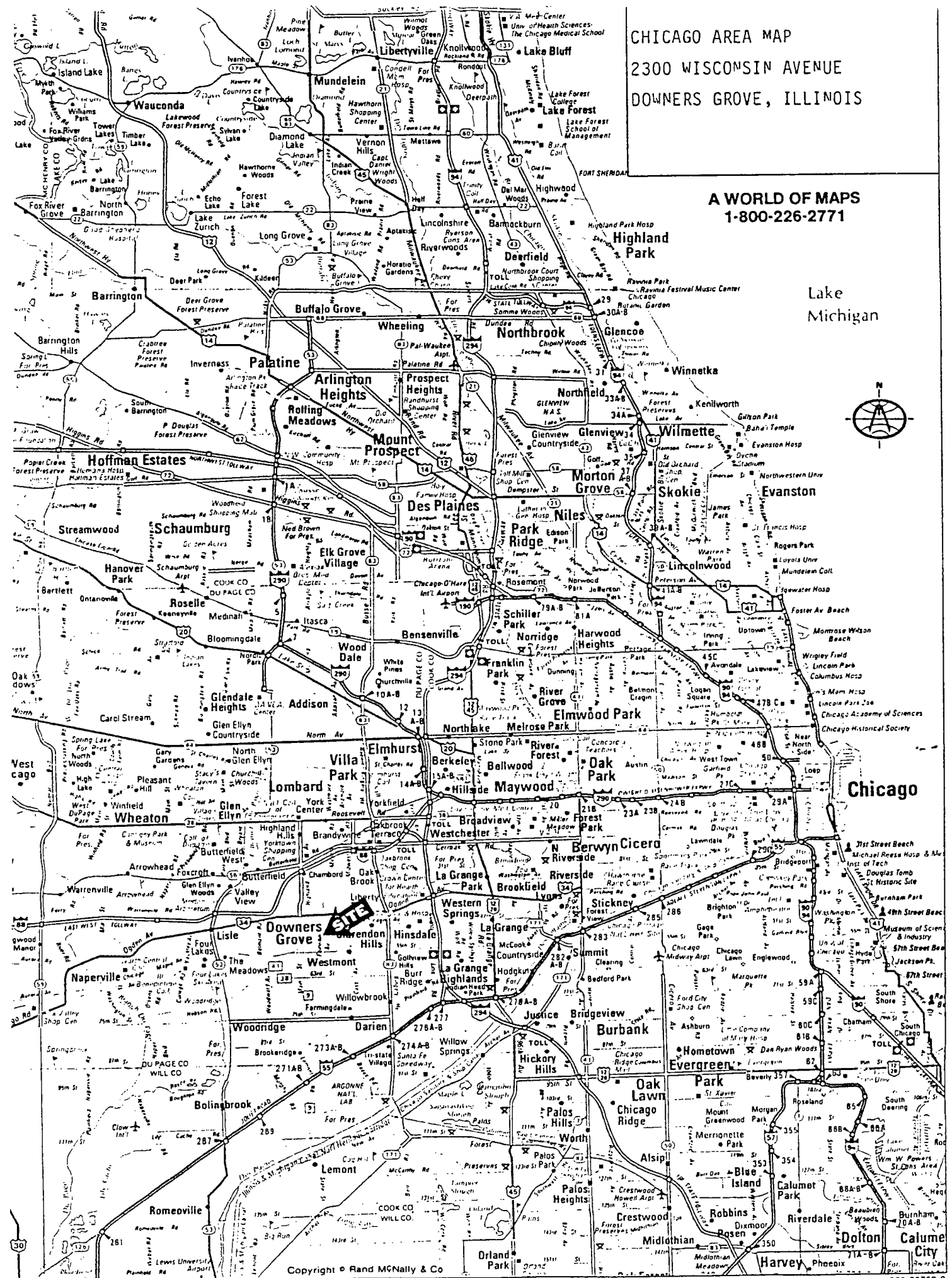
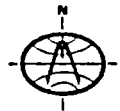
VILLA PARK, ILLINOIS, MAY 30, 1974

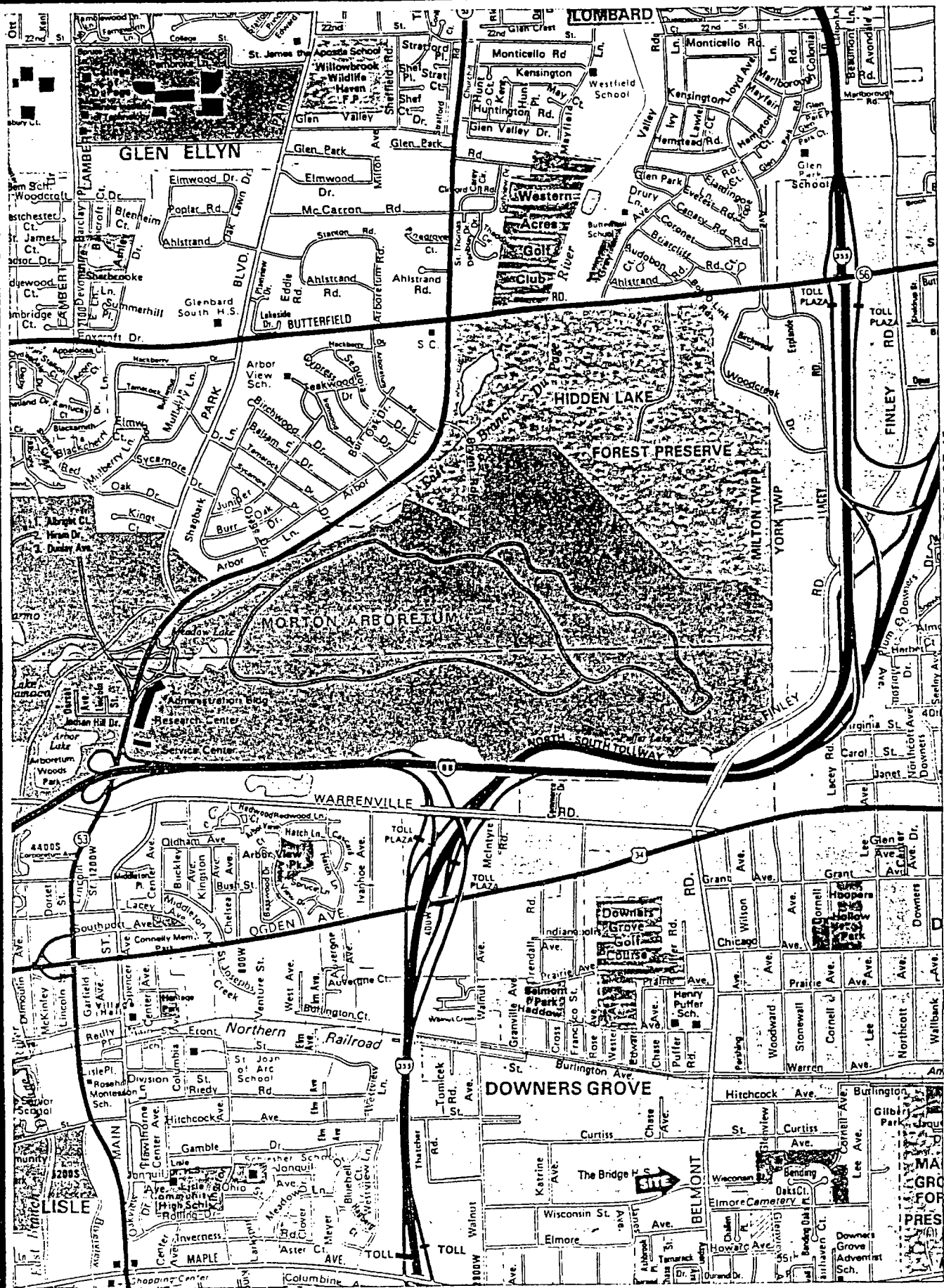
Carl R. Harrington

CHICAGO AREA MAP
2300 WISCONSIN AVENUE
DOWNERS GROVE, ILLINOIS

A WORLD OF MAPS
1-800-226-2771

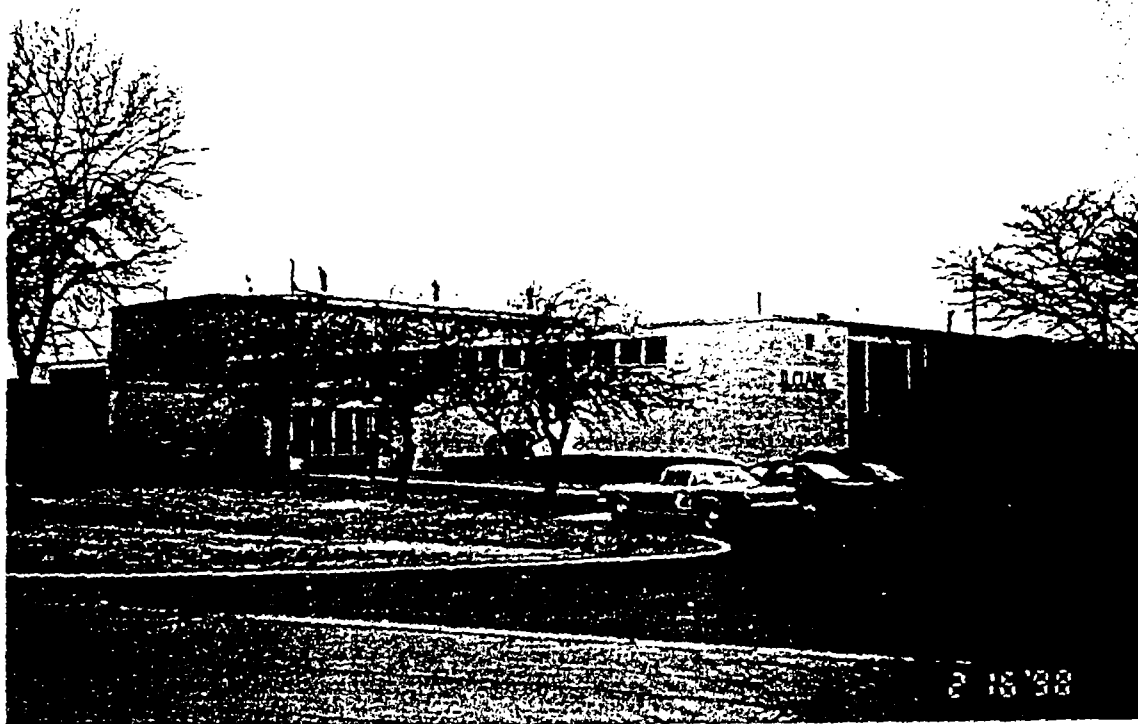
Lake
Michigan



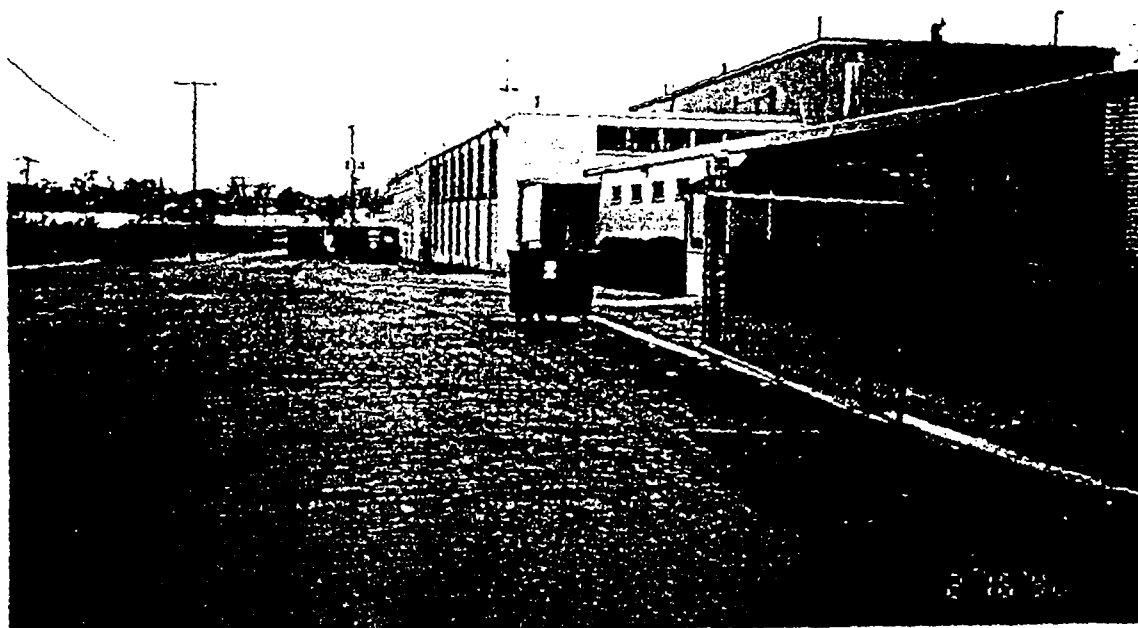


Appendix D: Plat of Survey

Appendix E: Property Photographs



VIEW OF THE SOUTHEASTERN PORTION OF THE PROPERTY



VIEW OF THE WESTERN PORTION OF THE PROPERTY

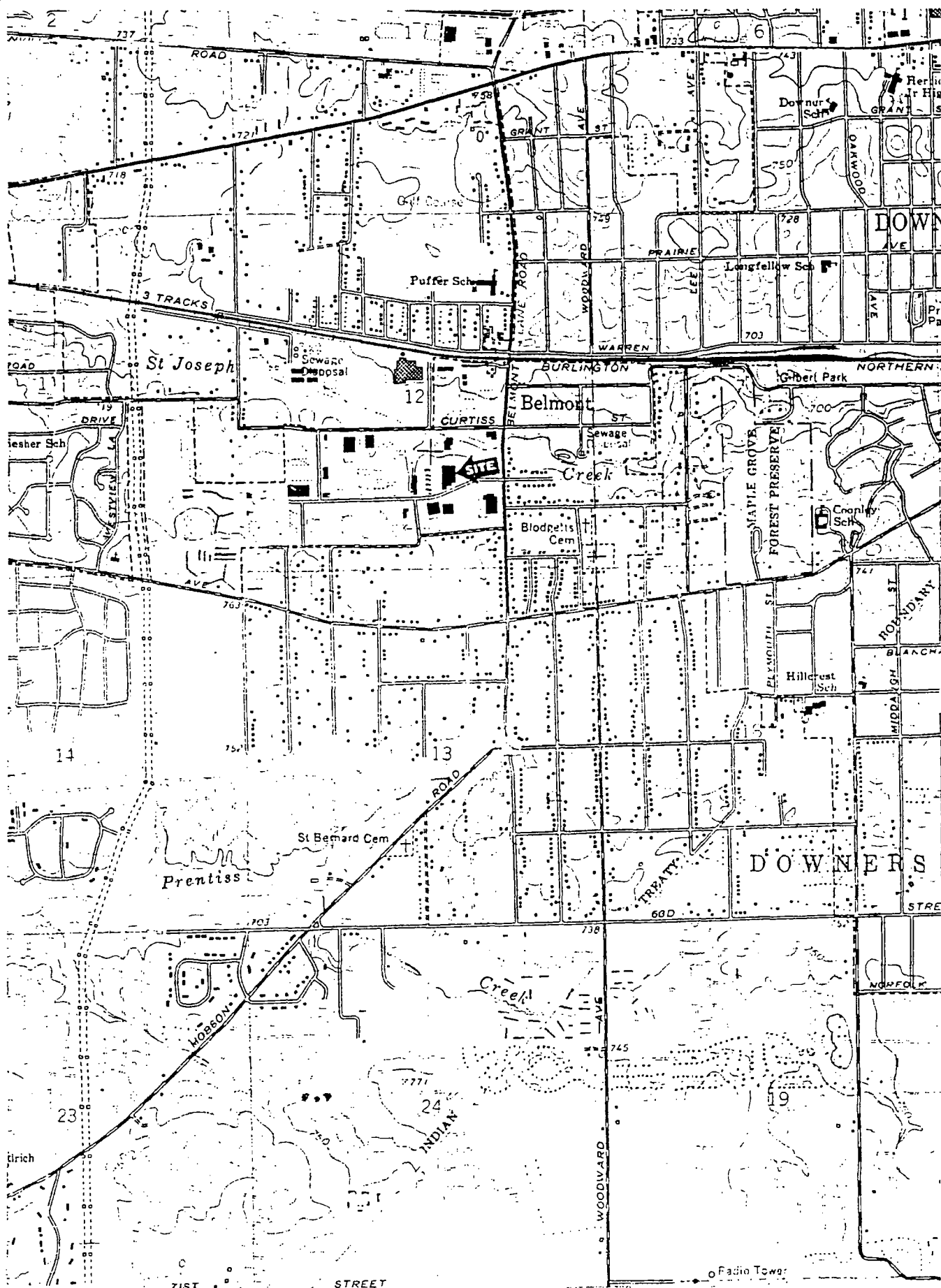


VIEW OF THE NORTHERN PORTION OF THE PROPERTY



VIEW OF THE NORTHEASTERN PORTION OF THE PROPERTY

Appendix F: USGS Topographic Map



Appendix G: ERIIS Environmental Data Report

505 Huntmar Park Dr, Suite 200
Herndon, VA 20170
(703)834-0600 (800)989-0402
FAX: (703)834-0606

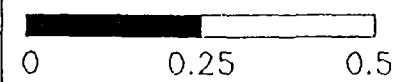
SITE INFORMATION

J.I. Clark Phase I
2300 Wisconsin Avenue
Downers Grove, IL
Dupage County
Job Number: 224645A
Map Plotted: Feb 9, 1998

MAP LEGEND

- ☐ Target Area
- ☐ Radii .25, .5, 1 Mi
- Hydrography
- Railroads
- Roads
- Highways
- ★ NPL 0 Sites
- ☐ RCRIS_TS 0 Sites
- ☐ RCRIS_CA 0 Sites
- CERCLIS 0 Sites
- NFRAP 1 Site
- ☐ RCRIS_LG 5 Sites
- ☐ RCRIS_SG 10 Sites
- ☆ ERNS 0 Sites
- HWS 0 Sites
- ⊕ LRST 6 Sites
- △ SWF 0 Sites
- ◇ RST 4 Sites

Miles



The Information on this map is subject to the ERIS Disclaimer

Copyright 1997 ERIS, Inc.





505 Huntmar Park Dr, Suite 200
Herndon, VA 20170
(703)834-0600 (800)989-0402
FAX: (703)834-0606

SITE INFORMATION

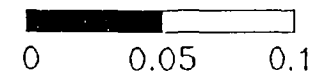
J.I. Clark Phase I
2300 Wisconsin Avenue
Downers Grove, IL
Dupage County
Job Number: 224645A
Map Plotted: Feb 9, 1998

MAP LEGEND

- Target Area
- Radii .25, .5, 1 Mi
- Hydrography
- Railroads
- Roads
- Highways
- NPL 0 Sites
- RCRIS_TS 0 Sites
- RCRIS_CA 0 Sites
- CERCLIS 0 Sites
- NFRAP 1 Site
- RCRIS_LG 5 Sites
- RCRIS_SG 10 Sites
- ERNS 0 Sites
- HWS 0 Sites
- LRST 6 Sites
- SWF 0 Sites
- RST 4 Sites

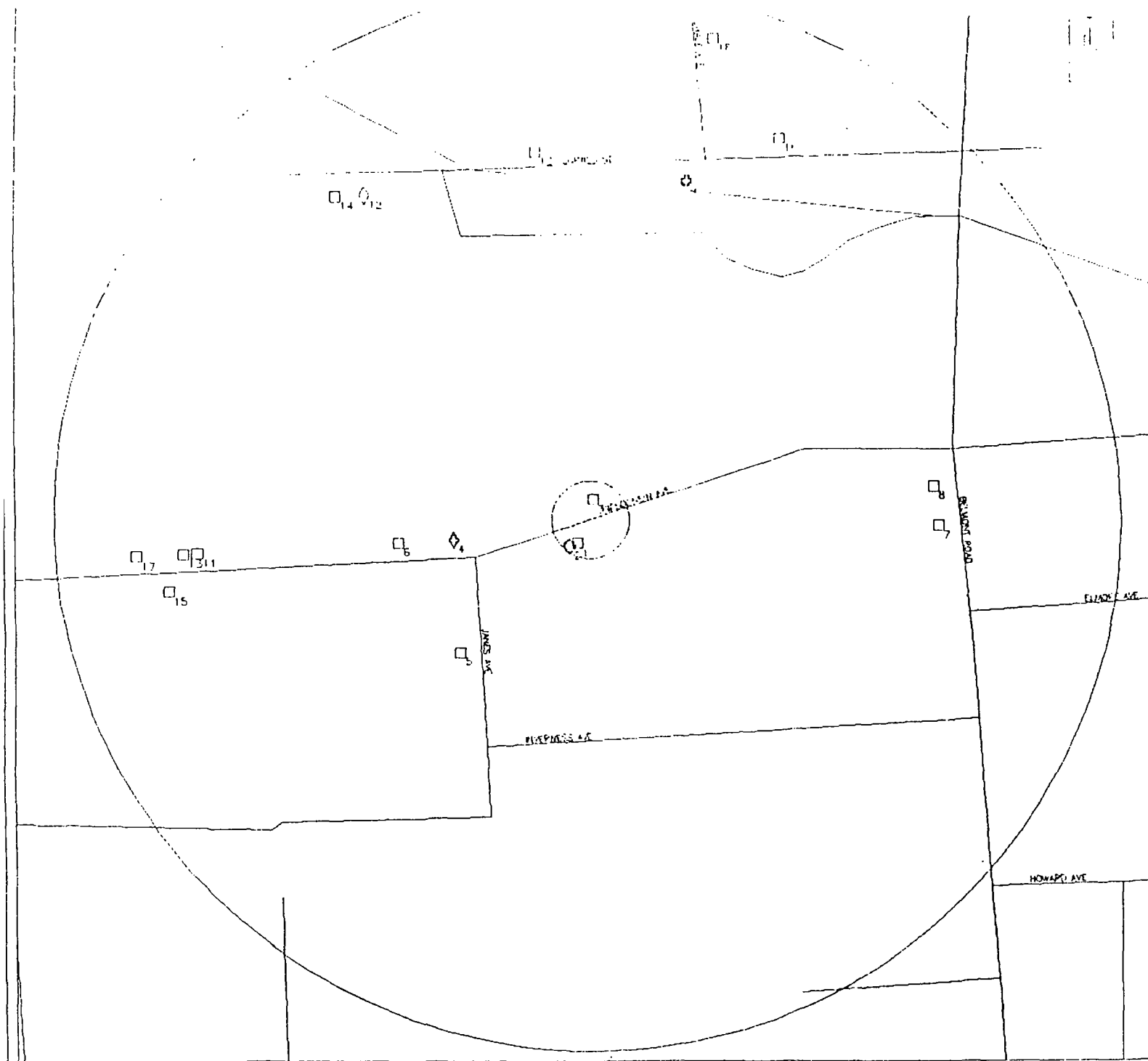
*Legend is not adjusted for 1/4 mile view.

Miles



The Information on this map is subject
to the ERIIS Disclaimer

Copyright 1997 ERIIS, Inc.



ERIIS ASTM Detail Radius Report

SUBJECT PROPERTY: J.L. Clark Phase I
2300 Wisconsin Avenue
Downers Grove, IL 60515

ORDERED BY: Mostardi-Platt Associates, Inc.

REPORT NUMBER: 224645A

PREPARED ON: 02/09/98

ERIIS DISCLAIMER

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ERIIS ASTM Detail Radius Statistical Profile

IS Report #224645A

Feb 9, 1998

E: J.L. Clark Phase I
2300 Wisconsin Avenue
Downers Grove, IL 60515

Latitude: 41.789878
Longitude: -88.041550

te: IL

DATABASE	RADIUS (MI)	TARGET AREA**	PROPERTY-1/4	1/4-1/2	1/2-1	>1	TOTAL
NPL	1.00		0	0	0		0
CERCLIS	0.50		0	0			0
RCRIS_TS	0.50		0	0			0
RCRIS_LG	0.25		5				5
RCRIS_SG	0.25	X	10				10
ERNS	0.05		0				0
LRST	0.50		2	4			6
RST	0.25	X	4				4
SWF	0.50		0	0			0
HWS	1.00		0	0	0		0
NFRAP	0.50	X	1	0			1
RCRIS_CA	1.00		0	0	0		0
			22	4	0	0	26

TOPO QUAD: Wheaton

Radon Zone Level: 2

Zone 2 has a predicted average indoor screening level ≥ 2 pCi/L and ≤ 4 pCi/L

A Radon Zone should not be used to determine if individual homes need to be tested for radon. The EPA's Office of Radiation and Indoor Air (202/233-9320) recommends that all homes be tested for radon, regardless of geographic location or the zone designation in which the property is located.

A target area is defined as a .02 mile buffer around the site's latitude and longitude.
A blank radius count indicates that the database was not searched by this radius per client instructions.
NR in a radius count indicates that the database cannot be reported by this search criteria due to insufficient and/or inaccurate addresses reported by a federal/state agency.

ENVIRONMENTAL RISK INFORMATION & IMAGING SERVICES
DATABASE REFERENCE GUIDE

Date of Data: 01/08/98
Release Date: 01/27/98
Date on System: 02/06/98
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
703/603-8881

National Priorities List

The NPL Report is an EPA listing of the nation's worst uncontrolled or abandoned hazardous waste sites. NPL sites are targeted for possible long-term remedial action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980. In addition, the NPL Report includes information concerning cleanup agreements between EPA and Potentially Responsible Parties (commonly called Records of Decision, or RODS), any liens filed against contaminated properties, as well as the past and current EPA budget expenditures tracked within the Superfund Consolidated Accomplishments Plan (SCAP).

CERCLIS

Date of Data: 01/08/98
Release Date: 01/27/98
Date on System: 01/30/98
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
703/603-8881

Comprehensive Environmental Response, Compensation, and Liability Information System

The CERCLIS Database is a comprehensive listing of known or suspected uncontrolled or abandoned hazardous waste sites. These sites have either been investigated, or are currently under investigation by the U.S. EPA for the release, or threatened release of hazardous substances. Once a site is placed in CERCLIS, it may be subjected to several levels of review and evaluation, and ultimately placed on the National Priorities List (NPL). In addition to site events and milestone dates, the CERCLIS Report also contains financial information from the Superfund Consolidated Accomplishments Plan (SCAP).

RCRIS_TS

Date of Data: 07/01/97
Release Date: 10/24/97
Date on System: 12/05/97
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
800/424-9346

Resource Conservation and Recovery Information System - Non-Corrective Action TSD Facilities

The RCRIS_TS Report contains information pertaining to facilities which either treat, store, or dispose of EPA regulated hazardous waste. The following information is also included in the RCRIS_TS Report:

- Information pertaining to the status of facilities tracked by the RCRA Administrative Action Tracking System (RAATS)
- Inspections & evaluations conducted by federal and state agencies
- All reported facility violations, the environmental statute(s) violated, and any proposed & actual penalties
- A complete listing of EPA regulated hazardous wastes which are generated or stored on-site

RCRIS_LG

Date of Data: 07/01/97
Release Date: 10/24/97
Date on System: 12/05/97
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
800/424-9346

Resource Conservation and Recovery Information System - Large Quantity Generators

The RCRIS_LG Report contains information pertaining to facilities which either generate more than 1000kg of EPA regulated hazardous waste per month, or meet other applicable requirements of the Resource Conservation And Recovery Act. The following information is also included in the RCRIS_LG Report:

- Information pertaining to the status of facilities tracked by the RCRA Administrative Action Tracking System (RAATS)
- Inspections & evaluations conducted by federal and state agencies
- All reported facility violations, the environmental statute(s) violated, and any proposed & actual penalties
- Information pertaining to corrective actions undertaken by the facility or EPA
- A complete listing of EPA regulated hazardous wastes which are generated or stored on-site

ENVIRONMENTAL RISK INFORMATION & IMAGING SERVICES
DATABASE REFERENCE GUIDE

RIS_SG

Date of Data: 07/01/97
Release Date: 10/24/97
Date on System: 12/05/97
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
800/424-9346

Resource Conservation and Recovery Information System - Small
Quantity Generators

The RCRIS_SG Report contains information pertaining to facilities which either generate between 100kg and 1000kg of EPA regulated hazardous waste per month, or meet other applicable requirements of the Resource Conservation And Recovery Act. On advice of the U.S. EPA, ERIIS does not report so-called "RCRA Protective Filers." Protective Filers, commonly called Conditionally Exempt Small Quantity Generators (CESQG's), are facilities that have completed RCRA notification paperwork, but are not, in fact, subject to RCRA regulation. The determination of CESQG status is made by the U.S. EPA. The following information is also included in the RCRIS_SG Report:

- Information pertaining to the status of facilities tracked by the RCRA Administrative Action Tracking System (RAATS)
- Inspections & evaluations conducted by federal and state agencies
- All reported facility violations, the environmental statute(s) violated, and any proposed & actual penalties
- Information pertaining to corrective actions undertaken by the facility or EPA
- A complete listing of EPA regulated hazardous wastes which are generated or stored on-site

ERNS

Date of Data: 10/24/97
Release Date: 11/05/97
Date on System: 01/20/98
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
202/260-2342

Emergency Response Notification System

ERNS is a national computer database system that is used to store information concerning the sudden and/or accidental release of hazardous substances, including petroleum, into the environment. The ERNS Reporting System contains preliminary information on specific releases, including the spill location, the substance released, and the responsible party. Please note that the information in the ERNS Report pertains only to those releases that occurred between January 1, 1997 and June 11, 1997.

ILUST

Date of Data: 07/24/97
Release Date: 08/01/97
Date on System: 09/12/97
IL Environmental Protection Agency
LUST Section
217 782-6762

Illinois Leaking Underground Storage Tank Report

The Illinois Leaking Underground Storage Tank Report is a comprehensive listing of all reported leaking underground storage tanks reported within the State of Illinois.

IST

Date of Data: 05/01/97
Release Date: 05/05/97
Date on System: 08/01/97
Color World of Printing - CDS Office Tec
Office of the State Fire Marshal
217/753-6501

Illinois Underground Storage Tank Report

The Illinois Underground Storage Tank Report is a comprehensive listing of all registered underground storage tanks located within the State of Illinois.

ILF

Date of Data: 08/30/93
Release Date: 09/01/93
Date on System: 02/14/97
IL Haz. Waste Research & Info. Center
Land-Based Disposal Sites Program
217/333-8940

Illinois Land-Based Disposal Sites Report

The Illinois Land-Based Disposal Site Report is an inventory of all active and historical waste disposal sites located within the State of Illinois. The inventory includes sites of all types including: municipal, industrial, hazardous, surface impoundments, illegal dumps, landfills, etc... Landfills tracked by the Northeastern Illinois Planning Commission (NIPC), as well as those sites listed in the Illinois EPA's "Available Disposal Capacity for Solid Waste in Illinois" Annual Report, are also included within the LBDS Report.

ENVIRONMENTAL RISK INFORMATION & IMAGING SERVICES
DATABASE REFERENCE GUIDE

Illinois Category List

Date of Data: 06/01/97
Release Date: 06/01/97
Date on System: 08/29/97
IL Environmental Protection Agency

217/524-3266

The Illinois Category List is a summary listing of those facilities that are deemed potentially hazardous by the Illinois Environmental Protection Agency. The Status field indicates which Illinois EPA Program is responsible for regulating the facility.

UAP

Date of Data: 08/12/97
Release Date: 08/13/97
Date on System: 10/03/97
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
703/603-8881

No Further Remedial Action Planned Sites

The No Further Remedial Action Planned Report (NFRAP), also known as the CERCLIS Archive, contains information pertaining to sites which have been removed from the U.S. EPA's CERCLIS Database. NFRAP sites may be sites where, following an initial investigation, either no contamination was found, contamination was removed quickly without need for the site to be placed on the NPL, or the contamination was not serious enough to require federal Superfund action or NPL consideration.

RCRIS_CA

Date of Data: 07/01/97
Release Date: 10/24/97
Date on System: 12/05/97
US Environmental Protection Agency
Office of Solid Waste and Emergency Response
800/424-9346

Resource Conservation and Recovery Information System - TSD's Subject to Corrective Action

The RCRIS_CA Report contains information pertaining to hazardous waste treatment, storage, and disposal facilities (RCRA TSD's) which have conducted, or are currently conducting, a corrective action(s) as regulated under the Resource Conservation and Recovery Act. The following information is included within the RCRIS_CA Report:

- Information pertaining to the status of facilities tracked by the RCRA Administrative Action Tracking System (RAATS)
- Inspections & evaluations conducted by federal and state agencies
- All reported facility violations, the environmental statute(s) violated, and any proposed & actual penalties
- Information pertaining to corrective actions undertaken by the facility or EPA
- A complete listing of EPA regulated hazardous wastes which are generated or stored on-site

a selected database does not appear on this list, it is not available for the subject property's state.

FACILITY ADDRESS COMMENTS	DISTANCE FROM SITE	DIRECTION FROM SITE	MAP ID
FACILITY ADDRESS COMMENTS	DISTANCE FROM SITE	DIRECTION FROM SITE	MAP ID
0 - 1/4 Miles			
008000406 Clark J L Manufacturing Co Atlas Tube RIS_SG 2300 Wisconsin Ave Downers Grove, IL 60515-4021 County: Du Page	0.00 Mi	SITE	3
010013060 Magnetek Inc T 2333 Wisconsin Ave Downers Grove, IL 60515-4022 County: Du Page	0.00 Mi	SITE	2
039000460 Suburban Self Storage Facility RAP 2333 Wisconsin Ave Downers Grove, IL 60515-4022 County: Du Page	0.00 Mi	SITE	2
008000231 Tricon Industries Inc RIS_SG 2325 Wisconsin Ave Downers Grove, IL 60515-4022 County: Du Page	0.00 Mi	SITE	1
010013004 Burnside Construction Company T 2400 Wisconsin Ave Downers Grove, IL 60515-4019 County: Du Page	0.05 Mi	SOUTHWEST	4
005010386 Suburban Moving & Storage ST 2400 Wisconsin Ave Downers Grove, IL 60515-4019 County: Du Page	0.05 Mi	SOUTHWEST	4
007001351 Bison Gear And Engineering Co RIS_LG 2424 Wisconsin Ave Downers Grove, IL 60515-4019 County: Du Page	0.08 Mi	SOUTHWEST	6
008000774 Principal Mfg RIS_SG 5400 Janes Ave Downers Grove, IL 60515-4234 County: Du Page	0.08 Mi	SOUTHWEST	5
008000210 Arrow Gear Co RIS_SG 2301 Curtiss St Downers Grove, IL 60515-4055 County: Du Page	0.16 Mi	NORTHEAST	9
010012994 Arrow Gear Co IT 2301 Curtiss St Downers Grove, IL 60515-4055 County: Du Page	0.16 Mi	NORTHEAST	9
005001074 Arrow Gear Co. IST 2301 Curtiss St Downers Grove, IL 60515-4055 County: Du Page	0.16 Mi	NORTHEAST	9
008010418 Econo Temp RIS_SG 5280 Belmont Rd Downers Grove, IL 60515-4316 County: Du Page	0.16 Mi	NORTHEAST	8
007001644 Magnetrol International Inc RIS_LG 5300 Belmont Rd Downers Grove, IL 60515-4400 County: Du Page	0.16 Mi	SOUTHEAST	7
007000668 Rocknord Corp Bearing Oper RIS_LG 2400 Curtiss St Downers Grove, IL 60515-4056 County: Du Page	0.17 Mi	NORTHWEST	10

S Report #224645A

Feb 9, 1998

UHS ID. DATABASE	FACILITY ADDRESS COMMENTS	DISTANCE FROM SITE	DIRECTION FROM SITE	MAP ID
'010013081 RT	Scot Inc 2525 Curtiss St Downers Grove, IL 60515-4060 County: Du Page	0.18 Mi	NORTHWEST	12
'008007373 RIS_SG	Heuft Inc 2512 Wisconsin Ave Downers Grove, IL 60515-4230 County: Du Page	0.18 Mi	SOUTHWEST	11
'007000504 RIS_LG	Ames Supply Co 2537 Curtiss St Downers Grove, IL 60515-4059 County: Du Page	0.19 Mi	NORTHWEST	14
'008006245 RIS_SG	Cvp Systems Inc 2518 Wisconsin Ave Downers Grove, IL 60515-4230 County: Du Page	0.19 Mi	SOUTHWEST	13
'008010670 RIS_SG	Precision Brand Products Inc 2250 Curtiss St Downers Grove, IL 60515-4054 County: Du Page	0.20 Mi	NORTHEAST	16
'007000302 RIS_LG	Flexible Steel Lacing Co 2525 Wisconsin Ave Downers Grove, IL 60515-4241 County: Du Page	0.20 Mi	SOUTHWEST	15
'008008883 RIS_SG	Norwood Marking Sys 2538 Wisconsin Ave Downers Grove, IL 60515-4230 County: Du Page	0.21 Mi	SOUTHWEST	17
'008012296 RIS_SG	Serv All Co 5101 Chase Ave Downers Grove, IL 60515-4012 County: Du Page	0.23 Mi	NORTHEAST	18
<hr/> 1/4 - 1/2 Miles				
7005007705 RST	Molex Inc 5224 Katrine Ave Downers Grove, IL 60515-4061 County: Du Page	0.35 Mi	NORTHWEST	19
7005000923 RST	Amoco Oil Co. #9776 2231 Maple Ave Downers Grove, IL 60515-4404 County: Du Page	0.45 Mi	SOUTHEAST	20
7005010023 RST	Slampak Enterprises 4947 Belmont Rd Downers Grove, IL 60515-3226 County: Du Page	0.49 Mi	NORTHEAST	21
7005010024 RST	Slampak Union 76 4947 Belmont Rd Downers Grove, IL 60515-3226 County: Du Page	0.49 Mi	NORTHEAST	21

ERIS ENVIRONMENTAL DATA REPORT
 RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM - LARGE QUANTITY GENERATORS
 RCRIS LG - PLOTTABLE SITES - PAGE 1

IS Report #224645A

Feb 9, 1998

S ID ID	FACILITY	ADDRESS	MAP ID
07001351 064387905	Bison Gear And Engineering Co DISTANCE FROM SITE: 0.08 Miles DIRECTION FROM SITE: Southwest	2424 Wisconsin Ave Downers Grove, IL 60515-4019 County: Du Page	6

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	D001	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

07001644 089824684	Magnetrol International Inc DISTANCE FROM SITE: 0.16 Miles DIRECTION FROM SITE: Southeast	5300 Belmont Rd Downers Grove, IL 60515-4400 County: Du Page	7
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Facility Is Not Reported In Raats

07000668 005455571	Rexnord Corp Bearing Oper DISTANCE FROM SITE: 0.17 Miles DIRECTION FROM SITE: Northwest	2400 Curtiss St Downers Grove, IL 60515-4056 County: Du Page	10
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Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	D000	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	D002	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
3.	WASTE CODE:	D003	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
4.	WASTE CODE:	D006	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
5.	WASTE CODE:	D007	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
6.	WASTE CODE:	F001	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
7.	WASTE CODE:	F002	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
8.	WASTE CODE:	F003	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
9.	WASTE CODE:	F005	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
10.	WASTE CODE:	F006	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
11.	WASTE CODE:	F008	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
12.	WASTE CODE:	F010	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
13.	WASTE CODE:	F017	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
14.	WASTE CODE:	F001	AMOUNT OF WASTE:	197.31600
	SOURCE OF INFO:	Part A		
15.	WASTE CODE:	F006	AMOUNT OF WASTE:	87.09100
	SOURCE OF INFO:	Part A		

07000504 005163811	Ames Supply Co DISTANCE FROM SITE: 0.19 Miles DIRECTION FROM SITE: Northwest	2537 Curtiss St Downers Grove, IL 60515-4059 County: Du Page	14
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Facility Is Not Reported In Raats

ERIS ENVIRONMENTAL DATA REPORT
RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM - LARGE QUANTITY GENERATORS
RCRIS_LG - PLOTTABLE SITES - PAGE 2

IS Report #224645A

Feb 9, 1998

IS ID	FACILITY	ADDRESS	MAP ID
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HAZARDOUS WASTES:

1.	WASTE CODE:	U112	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	U140	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
3.	WASTE CODE:	U159	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
4.	WASTE CODE:	U220	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
5.	WASTE CODE:	U226	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

07000302	Flexible Steel Lacing Co	2525 Wisconsin Ave	15
005094230	DISTANCE FROM SITE: 0.20 Miles	Downers Grove, IL 60515-4241	
	DIRECTION FROM SITE: Southwest	County: Du Page	

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	F001	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

ERIS ENVIRONMENTAL DATA REPORT
RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM - SMALL QUANTITY GENERATORS
RCRIS SG - PLOTTABLE SITES - PAGE 1

IIS Report #224645A

Feb 9, 1998

IIS ID A ID	FACILITY	ADDRESS	MAP ID
008000231 0005084124	Tricon Industries Inc DISTANCE FROM SITE: 0.00 Miles DIRECTION FROM SITE: Site	2325 Wisconsin Ave Downers Grove, IL 60515-4022 County: Du Page	1

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	D000	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	D001	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
3.	WASTE CODE:	D002	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
4.	WASTE CODE:	F001	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
5.	WASTE CODE:	F002	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
6.	WASTE CODE:	F006	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
7.	WASTE CODE:	F007	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
8.	WASTE CODE:	F008	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
9.	WASTE CODE:	F009	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
10.	WASTE CODE:	P106	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
11.	WASTE CODE:	U134	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
12.	WASTE CODE:	U186	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
13.	WASTE CODE:	F001	AMOUNT OF WASTE:	1.82500
	SOURCE OF INFO:	Part A		
14.	WASTE CODE:	F002	AMOUNT OF WASTE:	1.82500
	SOURCE OF INFO:	Part A		
15.	WASTE CODE:	F006	AMOUNT OF WASTE:	1.82500
	SOURCE OF INFO:	Part A		
16.	WASTE CODE:	F007	AMOUNT OF WASTE:	1.82500
	SOURCE OF INFO:	Part A		
17.	WASTE CODE:	F008	AMOUNT OF WASTE:	1.82500
	SOURCE OF INFO:	Part A		
18.	WASTE CODE:	F009	AMOUNT OF WASTE:	1.82500
	SOURCE OF INFO:	Part A		
19.	WASTE CODE:	P106	AMOUNT OF WASTE:	.00400
	SOURCE OF INFO:	Part A		
20.	WASTE CODE:	U186	AMOUNT OF WASTE:	4.76200
	SOURCE OF INFO:	Part A		

008000406 0005130000	Clark J L Manufacturing Co Atlas Tube DISTANCE FROM SITE: 0.00 Miles DIRECTION FROM SITE: Site	2300 Wisconsin Ave Downers Grove, IL 60515-4021 County: Du Page	3
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Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	F003	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	F005	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM - SMALL QUANTITY GENERATORS
RCRIS_SG - PLOTTABLE SITES - PAGE 2

S Report #224645A

Feb 9, 1998

S ID ID	FACILITY	ADDRESS	MAP ID
8000774 05475694	Principal Mfg DISTANCE FROM SITE: 0.08 Miles DIRECTION FROM SITE: Southwest	5400 Janes Ave Downers Grove, IL 60515-4234 County: Du Page	5

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1	WASTE CODE: D001 SOURCE OF INFO: Notification	AMOUNT OF WASTE: .00000
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8000210 05075205	Arrow Gear Co DISTANCE FROM SITE: 0.16 Miles DIRECTION FROM SITE: Northeast	2301 Curtiss St Downers Grove, IL 60515-4055 County: Du Page	9
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Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE: D001 SOURCE OF INFO: Notification	AMOUNT OF WASTE: .00000
2.	WASTE CODE: F001 SOURCE OF INFO: Notification	AMOUNT OF WASTE: .00000
3.	WASTE CODE: F009 SOURCE OF INFO: Notification	AMOUNT OF WASTE: .00000

8010418 984914135	Econo Temp DISTANCE FROM SITE: 0.16 Miles DIRECTION FROM SITE: Northeast	5280 Belmont Rd Downers Grove, IL 60515-4316 County: Du Page	8
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Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE: D000 SOURCE OF INFO: Notification	AMOUNT OF WASTE: .00000
2.	WASTE CODE: D001 SOURCE OF INFO: Notification	AMOUNT OF WASTE: .00000
3.	WASTE CODE: D008 SOURCE OF INFO: Notification	AMOUNT OF WASTE: .00000
4.	WASTE CODE: D039 SOURCE OF INFO: Notification	AMOUNT OF WASTE: .00000

08007373 984820936	Heuft Inc DISTANCE FROM SITE: 0.18 Miles DIRECTION FROM SITE: Southwest	2512 Wisconsin Ave Downers Grove, IL 60515-4230 County: Du Page	11
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Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE: D001 SOURCE OF INFO: Notification	AMOUNT OF WASTE: .00000
2.	WASTE CODE: F001 SOURCE OF INFO: Notification	AMOUNT OF WASTE: .00000

08006245 0984789776	Cvp Systems Inc DISTANCE FROM SITE: 0.19 Miles DIRECTION FROM SITE: Southwest	2518 Wisconsin Ave Downers Grove, IL 60515-4230 County: Du Page	13
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Facility Is Not Reported In Raats

ERIIS ENVIRONMENTAL DATA REPORT
RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM - SMALL QUANTITY GENERATORS
RCRIS_SG - PLOTTABLE SITES - PAGE 3

IS Report #224645A

Feb 9, 1998

IS ID ID	FACILITY	ADDRESS	MAP ID
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HAZARDOUS WASTES:

1.	WASTE CODE:	D001	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

08010670	Precision Brand Products Inc	2250 Curtiss St	16
984919894	DISTANCE FROM SITE: 0.20 Miles	Downers Grove, IL 60515-4054	
	DIRECTION FROM SITE: Northeast	County: Du Page	

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	D001	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	F003	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
3.	WASTE CODE:	F005	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

08008883	Norwood Marking Sys	2538 Wisconsin Ave	17
984848564	DISTANCE FROM SITE: 0.21 Miles	Downers Grove, IL 60515-4230	
	DIRECTION FROM SITE: Southwest	County: Du Page	

Facility Is Not Reported In Raats

FACILITY VIOLATIONS:

1.	DATE DETERMINED:	10/01/91	DATE RESOLVED:	10/05/92
	AREA OF VIOLATION:	Generator-all Requirements		

FACILITY EVALUATIONS:

1.	EVALUATION DATE:	10/01/91	EVALUATION AGENCY:	State
	TYPE OF EVALUATION:	Non-financial Record Review		
	AREA(S) OF EVALUATION:	Generator-all Requirements		

FACILITY ENFORCEMENTS:

1.	ENFORCEMENT DATE:	12/04/1991	ENFORCEMENT AGENCY:	State
	TYPE OF ACTION:	Written, Informal Administrative Action		
	PENALTY(S):			

HAZARDOUS WASTES:

1.	WASTE CODE:	D001	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

08012296	Serv All Co	5101 Chase Ave	18
0000026021	DISTANCE FROM SITE: 0.23 Miles	Downers Grove, IL 60515-4012	
	DIRECTION FROM SITE: Northeast	County: Du Page	

Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1	WASTE CODE:	D001	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	D002	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

ERIS ENVIRONMENTAL DATA REPORT
ILLINOIS LEAKING UNDERGROUND STORAGE TANK REPORT
LRST - PLOTTABLE SITES - PAGE 1

S Report #224645A

Feb 9, 1998

S ID	FACILITY	ADDRESS	MAP ID
5010386	Suburban Moving & Storage DISTANCE FROM SITE: 0.05 Miles DIRECTION FROM SITE: Southwest	2400 Wisconsin Ave Downers Grove, IL 60515-4019 COUNTY: Du Page	4
IEPA ID 0430305158	LUST ID 913065		
5001074	Arrow Gear Co. DISTANCE FROM SITE: 0.16 Miles DIRECTION FROM SITE: Northeast	2301 Curtiss St Downers Grove, IL 60515-4055 COUNTY: Du Page	9
IEPA ID 0430305016	LUST ID 930214		
5007705	Molex Inc. DISTANCE FROM SITE: 0.35 Miles DIRECTION FROM SITE: Northwest	5224 Katrine Ave Downers Grove, IL 60515-4061 COUNTY: Du Page	19
IEPA ID 0430305011	LUST ID 880876		
5000923	Amoco Oil Co. #9776 DISTANCE FROM SITE: 0.45 Miles DIRECTION FROM SITE: Southeast	2231 Maple Ave Downers Grove, IL 60515-4404 COUNTY: Du Page	20
IEPA ID 0430305102	LUST ID 900983		
5010023	Slampak Enterprises DISTANCE FROM SITE: 0.49 Miles DIRECTION FROM SITE: Northeast	4947 Belmont Rd Downers Grove, IL 60515-3226 COUNTY: Du Page	21
IEPA ID 0430305157	LUST ID 962032		
5010024	Slampak Union 76 DISTANCE FROM SITE: 0.49 Miles DIRECTION FROM SITE: Northeast	4947 Belmont Rd Downers Grove, IL 60515-3226 COUNTY: Du Page	21
IEPA ID 0430305157	LUST ID 921361		

ERIIS ENVIRONMENTAL DATA REPORT
ILLINOIS UNDERGROUND STORAGE TANK REPORT
RST - PLOTTABLE SITES - PAGE 1

S Report #224645A

Feb 9, 1998

S ID	FACILITY	ADDRESS	MAP ID
0013060 3084	Magnetek Inc DISTANCE FROM SITE: 0.00 Miles DIRECTION FROM SITE: Site	2333 Wisconsin Ave Downers Grove, IL 60515-4022 COUNTY: Du Page	2
CONTACT: Marron, Patrick E. 312-969-7660		STATUS: Active NUMBER OF TANKS: 4	
0013004 2802	Burnside Construction Company DISTANCE FROM SITE: 0.05 Miles DIRECTION FROM SITE Southwest	2400 Wisconsin Ave Downers Grove, IL 60515-4019 COUNTY: Du Page	4
CONTACT: Bultema Randy 708-515-9999		STATUS: Active NUMBER OF TANKS: 2	
0012994 11201	Arrow Gear Co DISTANCE FROM SITE: 0.16 Miles DIRECTION FROM SITE: Northeast	2301 Curtiss St Downers Grove, IL 60515-4055 COUNTY: Du Page	9
CONTACT: Greco, Dave 312-969-7640		STATUS: Closed NUMBER OF TANKS: 0	
0013081 6273	Scot Inc DISTANCE FROM SITE: 0.18 Miles DIRECTION FROM SITE: Northwest	2525 Curtiss St Downers Grove, IL 60515-4060 COUNTY: Du Page	12
CONTACT: Cafaro Al 312-969-0620		STATUS: Closed NUMBER OF TANKS: 0	

NO FURTHER REMEDIAL ACTION PLANNED SITES
NFRAP - PLOTTABLE SITES - PAGE 1

IIS Report #224645A

Feb 9, 1998

IIS ID A ID	FACILITY	ADDRESS	MAP ID
039000460	Suburban Self Storage Facility	2333 Wisconsin Ave	2
0047033188	DISTANCE FROM SITE: 0.00 Miles	Downers Grove, IL 60515-4022	
	DIRECTION FROM SITE: Site	COUNTY: Du Page	
	SITE EVENT(S)	COMPLETE DATE	
	Screening Site Inspection	12/01/84	
	Discovery	08/01/80	
	Preliminary Assessment	12/01/83	
	Hazard Ranking Determined	09/29/85	
	Preliminary Assessment	03/02/93	

Summary of Unplottable Sites

Report #224645A

Feb 9, 1998

IS ID. ABASE	FACILITY ADDRESS COMMENTS	SELECTED BY
08008124 IS_SG	One Hour Cleaners 21 W 265 Maple Downers Grove, IL 60515 County: Du Page	ZIP code
08009087 IS_SG	Goodyear Svc Ctr 21 W 277 Maple Ave Downers Grove, IL 60515 County: Du Page	ZIP code
08006331 IS_SG	Borg Pontiac Inc 2300 Ceder Ave Downers Grove, IL 60515 County: Du Page	ZIP code
39000459 AP	Downers Grove Public Wells #6 & 8 41/47/38 0 - 088/01/50 0 Downers Grove, IL 60515 County: Du Page	ZIP code
08013819 IS_SG	Downers Grove Hhw Collection Belmont And Curtiss Site B Downers Grove, IL 60515 County: Du Page	ZIP code
07002976 IS_LG	Dupage Forest Pres Dist Lemont Davey Rd Half Mile W Of Orch R Downers Grove Twp, IL 60515 County: Du Page	ZIP code
10013098	University Of Illinois At Chicago 21-042 Finley Rd Downers Grove, IL 60515-1767 County: Du Page	ZIP code

ERIIS ENVIRONMENTAL DATA REPORT
RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM - LARGE QUANTITY GENERATORS
RCRIS_LG - UNPLOTTABLE SITES

S Report #224645A

Feb 9, 1998

S ID ID	FACILITY	ADDRESS
7002976 84818955	Dupage Forest Pres Dist Lemont	Davey Rd Half Mile W Of Orch R Downers Grove Twp, IL 60515 County: Du Page

Facility Is Not Reported In Rats

HAZARDOUS WASTES:

1.	WASTE CODE:	D000	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	D008	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

ERIS ENVIRONMENTAL DATA REPORT
RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM - SMALL QUANTITY GENERATORS
RCRIS SG - UNPLOTTABLE SITES

S Report #224645A

Feb 9, 1998

S ID ID	FACILITY	ADDRESS
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8006331 84791145	Borg Pontiac Inc	2300 Ceder Ave Downers Grove, IL 60515 County: Du Page
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Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	D001	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	F003	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
3.	WASTE CODE:	F005	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

8008124 84832626	One Hour Cleaners	21 W 265 Maple Downers Grove, IL 60515 County: Du Page
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Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	D000	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	F002	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

8009087 84852343	Goodyear Svc Ctr	21 W 277 Maple Ave Downers Grove, IL 60515 County: Du Page
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Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	D000	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	D001	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
3.	WASTE CODE:	D008	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
4.	WASTE CODE:	D018	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
5.	WASTE CODE:	D039	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

8013819 000560524	Downers Grove Hhw Collection	Belmont And Curtiss Site B Downers Grove, IL 60515 County: Du Page
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Facility Is Not Reported In Raats

HAZARDOUS WASTES:

1.	WASTE CODE:	D000	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
2.	WASTE CODE:	D001	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
3.	WASTE CODE:	D002	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		
4.	WASTE CODE:	D003	AMOUNT OF WASTE:	.00000
	SOURCE OF INFO:	Notification		

ERIS ENVIRONMENTAL DATA REPORT
ILLINOIS UNDERGROUND STORAGE TANK REPORT
RST - UNPLOTTABLE SITES

IS Report #224645A

Feb 9, 1998

IS ID	FACILITY	ADDRESS
0013098 33121	University Of Illinois At Chicago	21w042 Finley Rd Downers Grove, IL 60515-1767 COUNTY: Du Page
CONTACT: Nguyen Ann T 312-996-7159		STATUS: Closed NUMBER OF TANKS: 0

ERIS ENVIRONMENTAL DATA REPORT
NO FURTHER REMEDIAL ACTION PLANNED SITES
NFRAP - UNPLOTTABLE SITES

IS Report #224645A

Feb 9, 1998

IS ID A ID	FACILITY	ADDRESS
139000459 1981958382	Downers Grove Public Wells #6 & 3	41/47/38 0 - 088/01/50 0 Downers Grove, IL 60515 COUNTY: Du Page

SITE EVENT(S)	COMPLETE DATE
Discovery	04/23/87
Preliminary Assessment	06/19/87
Screening Site Inspection	06/23/92

ERIIS LIST OF STREETS IN THE RADIUS

IS Report #224645A

Feb 9, 1998

STREET NAME

55TH PL
 59TH ST
 60TH ST
 61ST ST
 AUBREY TER
 BELMONT ROAD
 BENDING OAKS PL
 BLAIR CT
 BLANCHARD ST
 BLUEBELL CT
 BURLINGTON AVE
 CHALLEN PL
 CHASE AVE
 CHICAGO AVE
 COLLEGE ROAD
 COLUMBINE AVE
 CORNELL AVE
 CROSS ST
 CURTISS ST
 DOVER DR
 DRENDEL ROAD
 EASTGATE CT
 EDWARD AVE
 ELINOR AVE
 ELMORE AVE
 FAIRHAVEN CT
 FAIRMONT DR
 FRANCISCO AVE
 GAMBLE DR
 GEORGE ST
 GILBERT AVE
 GLENVIEW ST
 GRANVILLE AVE
 HADDOW AVE
 HAGBERG CT
 HILLCREST AVE
 HITCHCOCK AVE
 HOBSON ROAD
 HOWARD AVE
 I 355
 I 88 RAMP
 INDIANAPOLIS AVE
 INVERNESS ROAD
 JACKSON DR
 JACQUELINE DR
 JAMES AVE
 KATRINE AVE
 LEE AVE
 LEONARD AVE
 LOMOND AVE
 MAPLE AVE
 MEADOW LANE
 MEYER DR
 NORTHCOTT AVE
 NORTHGATE CT
 PERRY DR
 PERSHING AVE
 PLYMOUTH ST
 PRAIRIE AVE
 PUFFER ROAD
 RAILROAD AVE
 RIDGEWAY DR
 RIEDY ROAD
 ROSE AVE
 ROSS DR
 SHERMAN AVE
 SMITH ROAD
 SPRINGSIDE AVE
 STONEWALL AVE
 THATCHER ROAD
 WALNUT AVE
 WALNUT CREEK ROAD
 WARREN AVE
 WESTERN AVE

ERIIS LIST OF STREETS IN THE RADIUS

IRIS Report #224645A

Feb 9, 1998

STREET NAME

WESTGATE CT
WESTVIEW LANE
WILSON AVE
WISCONSIN AVE
WOLFE DR
WOODWARD AVE

Appendix H: Examination of Title Records

EXAMINATION OF TITLE RECORDS			
Grantee	Instrument	Date	Lot No.
J.L. Clark Manufacturing Company	Quit Claim Deed	05/01/1988	1
Downers Grove National Bank	Deed in Trust	05/04/1971	1
Edna M. Pfau	Warranty Deed	05/04/1971	1
J.L. Clark Manufacturing Company	Warranty Deed	02/01/1967	1
Ellsworth Park Development Corporation	Deed	01/12/1962	Lots 1-4
Chain Belt Company	Deed	03/01/1955	Northwest Quarter of the Northwest Quarter of Section 12
Rudoiph Ellsworth	Deed in Trust	11/23/1937	Northwest Quarter of the Northwest Quarter of Section 12

Appendix I: ERIIS Map Site Search Report

SEARCH RESULTS
ERIIS HISTORICAL MAP COLLECTION

PERTAINING TO: J.L. Clark Phase I
2300 Wisconsin Avenue
Downers Grove, IL 60515

REPORT NUMBER: 224645A

No historic map coverage is available for this site in the ERIIS Historic Map Collection, for the period covering the years 1867 - 1990.

The ERIIS Historic Map Collection is the largest and most extensive private collection of prior-use maps in the United States, thereby affording the greatest degree of historic due diligence. ERIIS' inventory includes images from the following publishers:

- Bromley
- Dakin
- Hexamer
- Hopkins
- Manufacturers Mutual Fire Insurance Maps
- Nirenstein Real Estate Atlases
- Sanborn Fire Insurance Map Collections
- Scarlett and Scarlett
- Rascher
- William G. Baist

Appendix J: Manifested Waste Shipments - 1996

TUBE DIVISION

MANIFESTED WASTE SHIPMENTS-1996

DATE	VENDOR	DESCRIPTION	QUANTITY	MANIFEST
01/17/96	WRR	WASTE SOLVENT	440 GAL.	WIJ635051
03/14/96	SAFETY-KLEEN	PARTS SOLVENT	81 GAL	ID5723616
03/27/96	WRR	WASTE SOLVENT	440 GAL	WIJ671134
03/27/96	BEAVER OIL	OILY WATER	330 GAL	IL6766001
06/05/96	SAFETY-KLEEN	PARTS SOLVENT	81 GAL	IL5800093
07/17/96	WRR	WASTE SOLVENT	385 GAL	WIJ680506
08/28/96	SAETY-KLEEN	PARTS SOLVENT	73 GAL	IL5839833
09/09/96	BEAVER OIL	OILY WATER	250 GAL	IL7220170
11/06/96	WRR	WASTE SOLVENT	330 GAL	WIJ769046

Appendix K: Lead Contaminated Brick Disposal Documentation

J.L.CLARK



Member of the CLARCOR consumer products group

Date: November 5, 1990

To: Dick Anderson

By: Jim Klotz *[Signature]*

Copies To: Bill Pruyn/Al Moore
Greg Gann/Gordon VerWeyst

Reference: J. L. Clark - Atlas Tube

Subject: Lead Pot Bricks

F162

We have received the analytical data required for permitting. A copy is attached for your files as well as the waste profile forms.

Permitting will take about 30 days. We anticipate a moderate increase in the disposal cost as this material changed from non-hazardous to a hazardous waste. This should be minimized by disposing of this material as non-treatable. We will keep you advised as the permit is approved.

/tkb

Attach.

BILL TO Environmental Waste Services, Inc.				GENERATOR NAME J. L. Clark			
ADDRESS 1641 Kensington Place				FACILITY ADDRESS 2300 Wisconsin Avenue			
CITY, STATE, ZIP Aurora, IL 60506				CITY, STATE, ZIP Downers Grove, IL 60515			
Contact: Sam Erwin				CONTACT Jim Klotz		PHONE 815-961-6356	
WASTE NAME Brick with lead				USEPA# ILD005130000		IEPA# 0311740002	
						SIC CODE 3499	
PROCESS DESCRIPTION Contaminated brick from melting operation				ANNUAL VOLUME 10 Cubic Yards			
				<input checked="" type="checkbox"/> BOX <input type="checkbox"/> DRUMS <input type="checkbox"/> TANKER			
PH 7.1	DENSITY 3-4000 LB/YD³	FLASH POINT > 200 °F	% TOTAL SOLIDS 99.99	PAINT FILTER pass	LOAD BEARING CAPACITY Not tested TON/FT²		
TOTAL CYANIDE 0.93 mg/kg	REACTIVE CYANIDE < 0.93 mg/kg	TOTAL SULFIDE < 0.4 mg/kg	REACTIVE SULFIDE < 0.4 mg/kg	TOTAL PHENOL 0.37 mg/kg	TOTAL CHLORINE Not tested ppm		
REID VAPOR PRESSURE Not tested	B S & W Not tested	T.O.C. Not tested	E.O.X. 23 PPM	ADDITIONAL			
ORGANICS							
TOTAL		E. P. TOXICITY		TOTAL		E. P. TOXICITY	
ARSENIC (As) 20.5		1.10		ENDRIN		None suspected	
BARIUM (Ba) 17.2				LINDANE		NS	
CADMIUM (Cd) < 0.002				METHOXYCHLOR		NS	
CHROMIUM (Cr) 5.51		0.004		TOXAPHENE		NS	
LEAD (Pb) 10388		7766		2, 4D		NS	
MERCURY (Hg) < 0.0088				2, 4, 5 SILVEX		NS	
SELENIUM (Se) 0.351							
SILVER (Ag) 1.64							
IS THIS A HAZARDOUS WASTE AS DEFINED IN 40 CFR 261? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				IF YES, INDICATE E.P.A. HAZARDOUS WASTE # D008			
IS THIS A POLLUTION CONTROL WASTE AS DEFINED IN 35 IL. ADM. CODE 858? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO							
COMPONENT NAME		%		COMPONENT NAME		%	
Brick		98-99					
Lead		.5-1					
HAZARDOUS MATERIAL DESCRIPTION (SEE 49 CFR 172.101) RQ Hazardous Waste, Solid, N.O.S.							
HAZARD CLASS ORM-E				UN/NA# NA9189(D008)			
IN PLANT DIRECTIONS							
THE UNDERSIGNED HEREBY STATES THAT HE/SHE IS AUTHORIZED TO SIGN THIS DOCUMENT ON BEHALF OF THE GENERATOR, AND THAT TO THE BEST OF HIS/HER KNOWLEDGE THE INFORMATION SET FORTH ABOVE IS TRUE AND CORRECT.							
<i>X Jim K. Klotz</i> NAME OF AUTHORIZED REPRESENTATIVE				<i>X Jim K. Klotz</i> SIGNATURE		11/2/90 DATE	
FOR PEORIA DISPOSAL COMPANY USE ONLY							
PERMIT#		AUTHORIZATION		METH FAC		ID#	
						EXPIRATION	
IAL CONDITIONS							
TIME (ONE WAY)		IN PLANT TIME		APPROVED BY		DATE	

Declaration Letter

Dear Customer:

This declaration letter provides us with information to make a determination on the analytical parameters to be run on your waste stream. If, to the best of your knowledge, that your waste stream may contain any of these parameters as listed below please make a notation on this form. If, to the best of your knowledge, your waste stream does not contain these parameters as listed below, please read and sign this form.

By signing this document, J. L. Clark hereby certifies that
(Generator's Name)

that the waste stream as described on Waste Management Generator's Waste Material

Profile Sheet # 07990 does not contain the following

pesticides and herbicides: Endrin, Lindane, Methoxychlor, Toxaphene, 2, 4-D, 2, 4,

5-TP (Silvex), Chlordane and Heptachlor (and its hydroxide) unless clearly noted.

X Jim K. Kot
Generator's Signature

X CHEMIST / ENVIRONMENTAL ENGINEER
Title

X 11-2-90
Date

TENCO LABORATORIES DIVN. OF THX, INC.

1150 Junction Avenue - Schererville, Indiana 46375

1-219-322-2560 • 1-800-428-3311

REPORT TO:

Sam Erwin

Environmental Waste Services

1641 Kensington

Aurora, IL 60506



Date: 7/31/90

Recd: 7/13/90

WO #: 22-2370

Laboratory Smp ID No.:	AA17401						
DESCRIPTION: —> less otherwise noted; ults in parts per lion - ppm] PARAMETERS:↓	J.L. Clark Brick Waste						maximum concentratio (metals only)
	AS RECEIVED	TOTAL	REACTIVE		TOTAL	EP TOXICITY	
DASHPOINT-(140°F)	>200°F			SILVER	0.003		5.0 ppm
Percent Acidity				ARSENIC	<0.010		5.0 ppm
Percent Alkalinity	0.00			BARIUM	0.188		100.0 ppm
pH (2-12.5**)	7.1			CADMIUM	<0.002		1.0 ppm
Percent Total Solids	99.99			CHROMIUM***	<0.004		5.0 ppm
SULFIDE	<0.4		<0.4	MERCURY	<0.003		.2 ppm
CYANIDE	0.93		<0.93	LEAD	179		5.0 ppm
PHENOL	0.370			SELENIUM	<0.010		1.0 ppm
Paint Filter Test	Pass						
Specific Gravity	3.134						
TOX	250						
				*** Total			

* Allowable Range

Fax 1-219-322-0440

WO #: 22-2752

[illegible]

TENCO ENVIRONMENTAL LABORATORIES

1150 Junction Avenue - Schererville, Indiana 46375

1-219-322-2560 • 1-800-428-3311

Fax 1-219-322-0440

REPORT TO:
Sam Erwin
Environmental Waste Services
1641 Kensington
Aurora, IL 60506



Date: 10/9/90

Recd: 8/22/90

WO #: 22-2752

Laboratory Smp ID No.:	AA17401						
DESCRIPTION: —> unless otherwise noted; results in parts per million - ppm] PARAMETERS:↓	JL Clark Brick With Lead				Detection Limits	Regulatory Level (mg/L)	EPA HW Number
EMI-VOLATILES-TCLP ORGANICS*							
Cresol, total	ND				0.002 ppm	200.0	D026
1,4-Dichlorobenzene	ND				0.002 ppm	7.5	D027
2,4-Dinitrotoluene	ND				0.002 ppm	0.13	D030
Hexachlorobenzene	ND				0.002 ppm	0.5	D032
Hexachlorobutadiene	ND				0.002 ppm	0.5	D033
Hexachlorethane	ND				0.002 ppm	3.0	D034
Nitrobenzene	ND				0.002 ppm	2.0	D036
Pentachlorophenol	ND				0.002 ppm	100.0	D037
Pyridine	ND				0.002 ppm	5.0	D038
2,4,5-Trichlorophenol	ND				0.002 ppm	400.0	D041
2,4,6-Trichlorophenol	ND				0.002 ppm	2.0	D042

Appendix L: De Minimis PRP Correspondence



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 07 1994

REPLY TO THE ATTENTION OF

77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604-3590
TEL: (312) 355-6000
FAX: (312) 355-6001

Re: American Chemical Service Superfund Site
Griffith, Indiana

Dear Sir or Madam:

The United States Environmental Protection Agency ("EPA") is currently involved in cleaning up the American Chemical Service ("ACS") facility, which is a Superfund site located in Lake County, Griffith, Indiana. Superfund is a federal program administered by EPA pursuant to federal law that is designed to clean up hazardous substances ("waste") which pose a threat to human health or the environment. (The full name of the Superfund law is the Comprehensive Environmental Response, Compensation, and Liability Act, or "CERCLA.")

Under the Superfund law, EPA has the authority to take actions at a site, such as the ACS site, to protect public health, welfare, and the environment. Attached is the Declaration for the Record of Decision, a document which summarizes the cleanup decision made by EPA for this site. In addition, this law permits EPA to request that parties who are responsible for the waste at the site pay to clean up the site.

EPA is sending you this information because you are potentially responsible for contributing a small percentage of the total amount of waste sent to the site. EPA has based this determination on a review of business records obtained from the site, hazardous waste manifests, and information received from individuals like yourself requested by EPA.

entered into de minimis settlements with EPA to resolve their Superfund liability at over 65 sites across the country.

OFFER OF DE MINIMIS SETTLEMENT

Section 122(g) of CERCLA, 42 U.S.C. § 9622(g), allows EPA, in its discretion, to enter into de minimis settlements that are practicable, in the public interest, and involve only a minor portion of the response costs at a facility. Under this section, EPA may settle with de minimis PRPs who contributed hazardous substances to a facility where the amount and toxicity of the hazardous substances contributed by each party is minimal in comparison to other hazardous substances at the facility.

EPA is offering a de minimis settlement to you via the Administrative Order on Consent attached to this letter. As a de minimis party, you may resolve your liability to the United States upon execution (signing and returning the signature page to EPA) of the order and payment of the appropriate amount indicated in Appendix 4 of the Administrative Order on Consent.

EPA has determined that the amounts in Appendix 4 to be paid by settling de minimis parties represent their proportionate share, based on the volume of wastes contributed to the site, the total cost of remediation at the site, plus a premium to address the risk of underestimating response costs and of not recovering 100 percent of EPA's outstanding costs from parties not eligible for or not joining the de minimis settlement.

It is your obligation to demonstrate that you qualify as a de minimis party. Therefore, if you sign the Administrative Order on Consent, you are certifying to the United States that you qualify as a de minimis PRP. EPA retains the right to re-open the issue of your liability in the event information is discovered which indicates that you or your organization actually contributed waste that is significantly more toxic, or of significantly greater volume, than you certify to EPA in this Order.

PRP RESPONSE AND EPA CONTACT

You should notify EPA by July 22, 1994, if you are willing to participate in the settlement for this site. If you decide to participate, you must sign the signature page (page 22) of the enclosed Administrative Order on Consent and return it to EPA no later than close of business (5:00 p.m. C.T.) on July 22, 1994. DO NOT SEND ANY MONEY AT THIS TIME. Your executed signature page

between 1980 and 1990, EPA will provide copies of these transactions at the meeting at no charge to you.

Because of the large number of parties involved at this site, we encourage you to ask your questions at this meeting rather than contacting EPA by telephone. However, if you are unable to attend the meeting, you may call toll free 1-800-890-4219 and an EPA representative will return your call.

Sincerely,



Jo Lynn Traub
Acting Associate Director
Waste Management Division

Attachments

DECLARATION FOR THE RECORD OF DECISION

SITE NAME AND LOCATION

American Chemical Services
Griffith, Indiana

STATEMENT OF BASIS AND PURPOSE

This decision document represents the selected remedial action for the American Chemical Services (ACS) site located in Griffith, Indiana. This action was chosen in accordance with the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), and to the extent practicable, with the National Oil and Hazardous Substances Contingency Plan (NCP). This decision is based on the Administrative Record for this site.

The State of Indiana concurs with the selected remedy.

ASSESSMENT OF THE SITE

Actual or threatened releases of hazardous substances from the site, if not addressed by implementing the response action selected in this Record of Decision (ROD), may present an imminent and substantial endangerment to public health, welfare, or the environment.

DESCRIPTION OF THE REMEDY

The major components of the selected remedy include:

- Ground water pumping and treatment system to dewater the site and to contain the contaminant plume with subsequent discharge of the treated ground water to surface water and wetlands;
- Excavation of approximately 400 drums in the On-site Containment Area for offsite incineration;
- Excavation of buried waste materials and treatment by low-temperature thermal treatment (LTTT);
- On-site treatment or off-site disposal of treatment condensate;
- Vapor emission control during excavation and possible immobilization of inorganic contaminants after LTTT;
- Off-site disposal of miscellaneous debris;
- In-situ vapor extraction pilot study of buried waste in On-site Area;

411 East Wisconsin Avenue
Milwaukee Wisconsin 53202-4497
414.277-5000
FAX 414.271-3552

Attorneys at Law in
Milwaukee and Madison, Wisconsin
West Palm Beach and Naples, Florida
Phoenix, Arizona



July 13, 1994

James K. Klotz
Chemist/Environmental Engineer
Clarcor
2323 Sixth Street
P.O. Box 7007
Rockford, IL 61125

VIA FACSIMILE
(815) 962-0417
AND REGULAR MAIL

Re: American Chemical Services - Buyout Proposal

Dear Jim:

By letter dated June 7, 1994, J.L. Clark received a "buyout" offer from the Environmental Protection Agency to settle the Company's potential liability for the American Chemical Services ("ACS") Superfund Site in Griffith, Indiana. You sent us a copy of the settlement packet on June 27. Subject to the discussion provided below, we recommend participation in the proposed settlement. This will require execution of an Administrative Order on Consent ("AOC") and payment of \$3,076.79 on behalf of the Company, but it should, at the same time, effectively resolve the Company's liability with respect to this matter.

Benefits of Settlement

Section 122(g) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or Superfund), 42 U.S.C. § 9622(g), authorizes EPA to enter into settlements with "de minimis" parties, i.e., those parties who contributed small amounts of waste in relation to total waste volumes at a particular site. These settlements generally resolve all matters with respect to cleanup and, thus, are called "buyout" settlements.

Two primary benefits are associated with these settlements. First, EPA executes a "covenant not to sue," which reflects the government's promise not bring any further action against you regarding the cleanup. Second, settling parties receive "contribution protection," which protects them, to the extent allowed by CERCLA, against litigation brought by other parties

seeking additional payments toward cleanup costs. In this case, the proposed AOC would be executed by the State of Indiana as well, which protects the Company against further state, as well as federal, action pertaining to the ACS cleanup.

These two elements, taken together, should really resolve the Company's liability with respect to this site. There are some exceptions, but they are quite narrow and unlikely to occur. For example, if new information is developed demonstrating that substantially greater amounts of waste were contributed by the Company, further action might be taken by the government. Also, while contribution protection insulates you from additional liability for cleanup costs, it does not prohibit litigation against you. In other words, other potentially responsible parties might still sue you (after all, just about anybody can sue you), which could result in some corresponding transactional costs, but your settlement with EPA should protect you from any further contribution toward cleanup costs. Finally, the settlement does not protect anybody from private party lawsuits or claims for natural resource damages, although there is nothing to suggest that those types of proceedings are imminent here anyway.

Terms of Settlement

The terms of settlement are quite straightforward. Based upon billing and transportation records, EPA calculated the volume of waste shipped by each company to ACS from 1955 through 1990. Prior to 1975, a significant portion of the wastes were processed and reclaimed on site. Most of the contamination occurred during this period of time. After 1975, virtually all of the wastes were incinerated, but spills continued to occur as the material itself was handled on site. In order to account for these changes in operations, EPA adjusted volumetric contributions to reflect what might actually have been left on site. For example, for the period after late 1980, when virtually all of the waste was incinerated, EPA reduced volumetric contributions by 99%. With revised volumetric figures, EPA then calculated the percentage contribution of each generator to the site.

To calculate a dollar contribution, EPA first multiplied your percentage times approximately \$3 million in past costs. To account for the projected cost of cleanup, EPA estimated about \$70 million in future costs. Then, it took your percentage times a multiplier of 2.0 times \$70 million to calculate your contribution

James K. Klotz
July 13, 1994
Page 3

toward future costs. The future and past costs taken together reflect your total contribution. For J.L. Clark, the resulting figure is \$3,076.79.

Is the approach described above fair in general? If not fair, it's at least common for settlements of this sort. One can debate the accuracy of projected cleanup costs. One can debate the equity of a multiplier equal to 2.0. Multipliers are typically justified by the risks associated with remedy implementation. Since the buyout parties are protected against cost overruns and potential remedy failure, EPA extracts a premium as a condition of settlement. Here, the terms are certainly within the range typical for settlements of this type. Also, they are applied uniformly to all buyout parties, which suggests an even-handed approach.

With respect to the 99% reduction for wastes delivered to ACS after November 11, 1990, one can genuinely debate whether the discount should be higher than 99%. Simply put, there is no way to establish, with respect to any given party or shipment, that 1% of the waste handled was spilled or released on site before incineration. Still, the fact remains that the reduction is substantial, and it results in a calculation based upon 1% of your total shipments to ACS after late 1980. Also, as noted previously, it is applied even-handedly to all of the buyout parties. It may be an administrative convenience, but a uniform discount is probably necessary to complete the calculations for a buyout settlement.

Are the figures accurate for J.L. Clark? This is really the only viable question as it relates to the Company's liability. EPA has assigned the Company a volume of 818 pounds for shipments during the 1980's. This means, of course, that EPA has identified shipments totalling 81,800 pounds before reducing it to 1% of the grand total. Your June 27 letter indicates that the volume is approximately correct. If you are satisfied that total shipments add up to about 81,800 pounds, then there is probably no further basis to challenge the calculation as applied to J.L. Clark. If the opposite is true, we might have to correct that figure. In any event, the figures for J.L. Clark do not appear to include pre-1980 figures for J.T. Clark, which was the substance of prior correspondence with the agency. (Interestingly, J.T. Clark doesn't appear at all on the PRP list.)

The only other basis to consider a challenge would relate to the nature of our waste. If we had a good basis to argue "no

toxicity," we might consider doing so, but the low settlement figure really doesn't justify such an approach under the circumstances.

Outlook Without Settlement

In a case involving almost 1,900 parties, as here, one has to wonder whether EPA or private participants will ever have much interest in "coming after" non-participants with small volumetric contributions. This is probably the most basic practical consideration to evaluate under the circumstances.

There is no way to predict with absolute certainty whether litigation will result from a decision not to participate at this time. Experience has shown, however, that there is every incentive for participants to sue non-participants, especially (i) under a statutory program that imposes joint and several liability and (ii) where there is a strong evidentiary link to a particular generator. (Again, this latter point assumes that we are satisfied with the accuracy of volumetric contributions assigned to J.L. Clark.) Even though individual contributions may be low, the likely recovery against a group of non-participants probably exceeds the cost of commencing litigation in the first place. A complaint seeking contribution is not difficult to prepare, and sooner or later an action against non-participants is generally more likely than not. There is also the possibility that, if a significant number of parties buy out, and there are unforeseen expenditures down the road, EPA or large-quantity generators may find it more attractive to pursue non-participants. It may cost much more to settle the dispute at that time, at least in relation to the current buyout offer.

Another practical consideration in favor of settlement is the ability to resolve the claim in a fashion that would eliminate the need to disclose it on audit reports. Without settlement, it would likely represent a threatened claim requiring disclosure. In any event, the decision to participate is really a judgment call. Balancing all of the factors described above, we certainly recommend settlement. This seems like the best way to resolve this matter in a situation where J.L. Clark is otherwise linked to the site both legally and factually. Moreover, the amount of settlement (\$3,076.79) (while one hates making these payments at all) is not great in relation to the potential transactional and settlement costs that could arise later on to resolve this matter.

How to Settle

In order to settle, the Company must complete and execute the signature page (page 22) of the AOC and return it for receipt by EPA no later than the close of business on Friday, July 22. A procedure for challenging the EPA database is described on page 4 of the June 7 letter. Again, let me know if you feel there is a basis to challenge the database. Payment is not required at this time. Payment will be due within 30 days after the effective date of the Order, which will not occur until we receive written notice from EPA that the Order has become effective, probably several months from now.

The operative portions of the AOC can be found at paragraphs 31-39 on pages 13-19 of the proposed Order. Each is briefly summarized below.

- 31 By signing the Order, the Company certifies that it has conducted a thorough, good faith search for relevant information, that documents have not been destroyed, that it has complied with EPA requests for information, and that it has never owned any portion of the facility.
- 32 Both EPA and Indiana agree, upon payment of the settlement amount, not to sue or take any other administrative action for reimbursement of response costs at the ACS site.
- 33 Both EPA and Indiana reserve their rights to pursue claims relating to criminal liability, natural resource damages, or the failure to comply with the Order.
- 33 EPA and Indiana reserve the right to seek additional costs if information is discovered indicating that the Company contributed wastes that are more toxic or hazardous than other materials at the site or contributed in excess of 0.8% of total hazardous substances. 0.8% is the cutoff for the de minimis settlement. J.L. Clark's volumetric percentage is 0.002159%.

- 34 The Order does not offer protection to any entity not signing the Order.
- 35 The Company agrees not to sue the government for reimbursement from the Superfund trust fund.
- 37 Each signatory reserves any rights it may have against parties who do not sign the Order.
- 38 The Respondents deny liability and reserve their right to contest matters in any subsequent proceeding other than one to enforce the Order.
- 39 Each Respondent receives contribution protection as provided for in Sections 113(f)(2) and 112(g)(5) of CERCLA.

Please let me know if you have particular questions about the Administrative Order on Consent or the remaining material provided with EPA's June 7 letter.

As we have indicated previously, we are advising about half a dozen clients who received the buyout offer. Other clients of the firm are on the list of approximately 1,900 provided with EPA's letter, although we have not been asked to counsel them on this matter. We are not advising parties in this matter who do not otherwise qualify for the de minimis settlement offer.

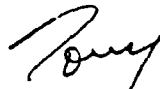
Again, we recommend settlement as a practical way to resolve this matter and to minimize, if not eliminate, virtually any further liability regarding the cleanup itself. Please feel free

James K. Klotz
July 13, 1994
Page 7

to call if you would like to discuss this further. My direct line
is (414) 277-5545.

Very truly yours,

QUARLES & BRADY



Arthur A. Vogel, Jr.

233/lag

cc: David Lindsay (mail)